

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 2 7 2015

# CERTIFIED MAIL 7010 1060 0002 1703 8211 RETURN RECEIPT REQUESTED

Dr. James M. Chansler, P.E.
Director, DeKalb County Department
of Watershed Management
1580 Roadhaven Drive
Stone Mountain, Georgia 30083

Re: Approval of the Revised System-Wide Hydraulic Model Program U.S. District Court Civil Action 1:10cv4039-WSD

Dear Dr. Chansler:

The U.S. Environmental Protection Agency Region 4 and the Georgia Environmental Protection Division have reviewed and hereby approve the revised System-Wide Hydraulic Model Program for DeKalb County submitted February 18, 2015, pursuant to Section VI.B.vii of the Consent Decree referenced above. DeKalb County shall implement the revised System-Wide Hydraulic Model Program in accordance with the schedule included in the submittal. In addition, DeKalb County shall certify the status of the implementation of the revised System-Wide Hydraulic Model Program, including its completion, in the Semi-Annual Report or Annual Report pursuant to Section IX of the subject Consent Decree.

Please contact Ms. Sara Janovitz at (404) 562-9870 or via email at <u>janovitz.sara@epa.gov</u>, if you have any questions.

Sincerely,

Maurice L. Horsey, IV, Chief

Municipal & Industrial Enforcement Section NPDES Permitting and Enforcement Branch

cc: Mr. Hsin-Sheng Yeh Georgia Environmental Protection Division

Ms. Marzieh Shahbazaz Georgia Environmental Protection Division

Mr. Charles Lambert DeKalb County

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 1 7 2017

#### CERTIFIED MAIL 7017 1450 0000 7913 0063 RETURN RECEIPT REQUESTED

The Honorable Michael Thurmond Chief Executive Officer DeKalb County Government 1300 Commerce Drive, 6<sup>th</sup> Floor Decatur, Georgia 30030

Re: Information Request - Section 308 of the Clean Water Act
Consent Decree, Civil Action No. 1:10-CV-04039-WSD
National Pollutant Discharge Elimination System Permit Nos. GA0024147 and GA0026871:
Snapfinger Creek Wastewater Treatment Facility and Pole Bridge Creek Wastewater Treatment Facility

#### Dear Mr. Thurmond:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency Region 4 hereby requests DeKalb County (the County) to provide the information set forth below regarding the Wastewater Treatment Facility (WWTFs) noted above and their Wastewater Collection and Transmission System (WCTS). The County is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Ms. Sara Janovitz, Enforcement Officer U.S. Environmental Protection Agency, Region 4 NPDES Permitting and Enforcement Branch 61 Forsyth Street, S.W. Atlanta, Georgia 30303-8960

The County's response should specifically reference the particular section of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible County official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The County shall preserve, until further notice, all records (either written or electronic), which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place as required. No such records shall be disposed of until written authorization is received from the Chief of the NPDES Permitting and Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Please contact Ms. Janovitz at (404) 562-9870 or by email at janovitz.sara@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

César A. Zapata Deputy Director

Water Protection Division

Enclosures

cc: See Attached Mailing List

#### Mailing List:

Mr. Thomas Mariani, Jr. United States Department of Justice

Ms. Valerie K. Mann United States Department of Justice

Mr. James Coots Georgia Department of Law

Mr. James Capp Georgia Environmental Protection Division

Mr. Lewis Hays Georgia Environmental Protection Division

Ms. Marzieh Shahbazaz Georgia Environmental Protection Division

Mr. Hsin-Sheng Yeh Georgia Environmental Protection Division

Ms. Overtis Brantley DeKalb County Law Department

Mr. E. Fitzgerald Veira Troutman Sanders LLP

Mr. Scott Towler DeKalb County Department of Watershed Management

#### ENCLOSURE A

#### DeKalb County, Georgia

- Identify any areas likely to have sanitary sewer overflow (SSO) events using the System-Wide Flow and Rainfall Monitoring Program set forth in Paragraph 26 of the Consent Decree. Based on the analysis and results of this Program:
  - a. Identify by Sewershed, the areas with the least dry weather flow capacity.
  - b. What is the percentage of capacity in dry weather flow in the trunk lines of the Wastewater Collection and Transmission System or WCTS (as that term is defined in the Consent Decree) by Sewershed?
  - c. Identify by Sewershed, the areas with the least wet weather flow capacity.
  - d. What is the percentage of capacity in wet weather flow in the trunk lines of the WCTS by Sewershed?
- Provide a copy of the contract and related scope of work documents the County used to hire CH2M to prepare the System-Wide Hydraulic Model pursuant to Paragraph 28 of the Consent Decree.
- Provide the date when the System-Wide Hydraulic Model prepared by CH2M on behalf of the County was given to the County.
- 4. Provide all records (whether written or electronic) from CH2M documenting its submission of the System-Wide Hydraulic Model to the County since May 2016. Has CH2M revised, edited, or provided supplemental information to the System-Wide Hydraulic Model after its initial submission to the County? If so, when?
- 5. Provide all records (whether written or electronic) of the County's and/or its contractor's efforts to calibrate and verify the System-Wide Hydraulic Model using selected monitored storm events.
- Provide all records (whether written or electronic) of "Model outputs and reports" as described in Section 1.5.5.1 of the County's January 2015 System-Wide Hydraulic Model Program.
- 7. Provide the WCTS capacity conclusions in the CH2M System-Wide Hydraulic Model.
- 8. Identify the dry and wet weather capacity-limited areas identified in the CH2M System-Wide Hydraulic Model. How much of the WCTS is capacity-limited, and which parts of the WCTS are capacity-limited? How much of this capacity-limited area is in the Initial and Additional Priority Areas (as those terms are defined in the Consent Decree)? Based on the results of the CH2M System-Wide Hydraulic Model:
  - a. Identify by Sewershed the areas with the least dry weather flow capacity?
  - b. What is the percentage of capacity in dry weather flow in the trunk lines of the WCTS by Sewershed?
  - c. Identify by Sewershed the areas with the least wet weather flow capacity?
  - d. What is the percentage of capacity in wet weather flow in the trunk lines of the WCTS by Sewershed?
- Provide the date when the County provided the system-wide hydraulic model prepared by CH2M to Brown & Caldwell for review.

- Provide all records (whether written or electronic) from Brown & Caldwell regarding its findings associated with its review of the System-Wide Hydraulic Model prepared by CH2M.
- 11. Provide a summary of the basic assumptions and input parameters for the System-Wide Hydraulic Model. How are these assumptions different from the standard inputs that were made in the initial System-Wide Hydraulic Model?
- 12. What, if any, work is outstanding regarding the System-Wide Hydraulic Model?
- 13. Provide a list of all new connections or increases in flow from existing sewer service connections to the County's WCTS that were authorized on or after January 1, 2016. In addition, provide copies of all letters or correspondence regarding the authorization of such connections.
- 14. Provide documentation of any certification of adequate collection, transmission, and treatment capacity that was made by a professional engineer licensed in the State of Georgia for the connections referenced in Question 13 above.
- 15. How does the County currently define "Adequate Collection Capacity," "Adequate Transmission Capacity," and "Adequate Treatment Capacity"? When were those definitions established? Prior to this date, how and when has the County defined these terms since entry of the Consent Decree?
- 16. Provide a copy of the power point presentation the County prepared and presented to the EPA and the Georgia Environmental Protection Division at the June 28, 2017 meeting among the parties.

#### **ENCLOSURE B**

## RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS (40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). Method and time of asserting business confidentiality claim. A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

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## Infrastructure Group

Watershed Management | Transportation | Roads and Drainage | Sanitation |
Fleet Management | Recreation, Parks and Cultural Affairs | Libraries | Beautification |
Cooperative Extension

January 19, 2018

Chief Executive Officer Michael L. Thurmond

Board of Commissioners

District I Nancy Jester

> District 2 Jeff Rader

> > District 4

District 3 Larry Johnson

Steve Bradshaw

District 5 Mereda Davis Johnson

> District 6 Kathie Garnon

District 7 Gregory A. Adams

The Honorable Trey Glenn Regional Administrator United States Environmental Protection Agency Region 4 Atlanta Federal Center

61 Forsyth Street Atlanta, Georgia 30303-8960

Mr. Richard E. Dunn Director Georgia Department of Natural Resources Environmental Protection Division 2 Martin Luther King, Jr. Drive Suite 1456, East Tower Atlanta, Georgia 30334

> Re: Request for Consent Decree Modification Civil Action No: 1:10-CV-04039-WSD

Dear Messrs. Glenn and Dunn:

DeKalb County appreciates the time and attention the U.S. Environmental Protection Agency ("EPA") Region 4 and the Georgia Environmental Protection Division ("EPD") have given the County to address issues related to the above-referenced Consent Decree. We look forward to continued cooperation with both agencies during the Consent Decree period. As the County continues to implement the various programs required under the Consent Decree, the need for a sanitary sewer Capacity Assurance Program ("CAP") has become apparent as a complement to the existing capacity, management, operation and maintenance ("CMOM") programs in the Consent Decree. As a result, the County requests EPA and EPD to consider modification of the Consent Decree to incorporate a CAP. This letter provides the basis for the County's request.

#### The Basis for the Modification Request

Section VI.B.(vii)(g) of the Consent Decree provides, in relevant part, that "[o]nce the Model is fully developed for each Sewershed, the County shall authorize new sewer service connections or increases in flow from existing sewer service connections in that Sewershed only after certifying that the receiving portions of the WCTS have adequate collection and transmission capacity and the applicable WWTF has adequate treatment capacity to accept flows from such new sewer service connections and/or increases in flows from existing service connections." The County now has a model fully developed to

support the certification process and, as the County has informed EPA, the County will not make connections contemplated by this provision without certification. However, the Consent Decree currently does not include a requirement for an EPA/EPD-approved CAP. Based on the County's current understanding of its sanitary sewer system, the County believes inclusion of a CAP as part of the Consent Decree will make implementation of the referenced Section VI B.(vii)(g) provision less onerous, while allowing the County to use its best efforts to eliminate sanitary sewer overflows ("SSOs").

As you know, a CAP is typically used to ensure that the entire wastewater collection, transmission and treatment system has sufficient capacity to convey and treat all wastewater generated by the system's customers. It is also used to anticipate and provide for prospective new sewer connections, and track growth to support short term and long-term planning. In addition, a CAP provides for those circumstances where capacity approvals in limited circumstances can be achieved, in lieu of certification. Such approvals are generally allowable as low risks to the environment and are precluded unless they meet precise conditions.

Through implementation of the Consent Decree's CMOM programs, the County has come to better understand that there will be instances where the County may not be able to certify capacity under Section VI.B.(vii)(g) and therefore will not be able to authorize certain new sewer service connections or increases in flow from existing sewer service connections. Four of the County's CMOM programs have been especially helpful in improving the County's knowledge of its system regarding capacity: (1) the Priority Areas Sewer Assessment and Rehabilitation Program ("PASARP"); (2) the Flow and Rainfall Monitoring Program; (3) the Hydraulic Modeling Program; and (4) the Sanitary Sewer Mapping Program.

All assessments required under the PASARP were completed on time as of December 2017. Those assessments identified some areas with capacity issues. In addition, detailed sanitary sewer mapping, flow and rainfall monitoring data, and modeling activities have been helpful in revealing certain capacity concerns. In addressing these capacity issues, compliance with the Consent Decree can become extremely onerous or even detrimental to the public interest in instances where connections are prohibited, but that would otherwise be prudent and justifiable. For example, connections for public safety facilities, heath facilities or a single-family home could be barred, even when there are no meaningful risks to the environment. This presents some short-term challenges for the County that can be avoided or remedied with a CAP so that the County can employ workable practical solutions such as infiltration and inflow credits that can be used to offset connections on an interim basis, and that will not exacerbate SSO risks while long-term solutions are put in place. A CAP would serve to round out the existing CMOM programs, by allowing for more practical interim solutions to short term issues that are in line with long-term solutions.

The County recognizes that in many instances where there are capacity limitations, the requested connections should not be allowed. However, in certain circumstances that are in the public interest, as can be specifically delineated in a CAP, the connections should be allowable. DeKalb County's Consent Decree does not specifically provide for such a CAP.

During the Consent Decree negotiations, technical studies and existing data supported the position that the County's sanitary sewer system did not have significant capacity issues, and that historic SSOs were primarily driven by maintenance issues. As such, the County did not see the need then to incorporate a CAP into the Consent Decree. While the facts continue to show the majority of SSOs are fats, oils, and grease-related or tied to other maintenance issues, the County has identified areas or experienced circumstances where capacity limitations could preclude connections in all circumstances under a strict reading of the current Consent Decree Section VI.B.(vii)(g) language. For sanitary sewer systems that anticipate capacity issues, the answer typically is to incorporate a CAP.

In an effort to create some flexibility to the County in situations where there are capacity limitations, as it implements the Consent Decree, the County believes that a CAP is appropriate and justifiable. As noted above, the CAP would allow for limited approvals in lieu of certification in circumstances where certain pre-conditions are met, while ensuring overall system capacity assurance planning. Accordingly, the County seeks to modify the Consent Decree so as to incorporate a CAP.

#### Modification of the Consent Decree

Section XIX of the Consent Decree provides for modification as follows:

The terms of this Consent Decree, including any attached appendices, may be modified only by a subsequent written agreement signed by all the Parties. Where a modification constitutes a material change to this Consent Decree, it shall be effective only upon approval by the Court. Non-material changes to this Consent Decree (including appendices) may be made by written agreement of the Parties without court approval, and the Parties may by mutual agreement determine whether a modification is non-material.

The County believes it is arguable that incorporation of a CAP into the Consent Decree can be done through a minor modification. A CAP can be crafted that is consistent with the spirit of Section VI.B.(vii)(g) and the overall goal of eliminating SSOs. Allowing approvals in lieu of certification in limited circumstances under a CAP that ensures overall capacity planning would not frustrate Section VI.B.(vii)(g) where public health and safety and the environment will continue to be protected. However, in the event EPA and EPD do not agree that a CAP is appropriate as a minor modification, the County would still request both agencies' cooperation through the process of a major Consent Decree modification.

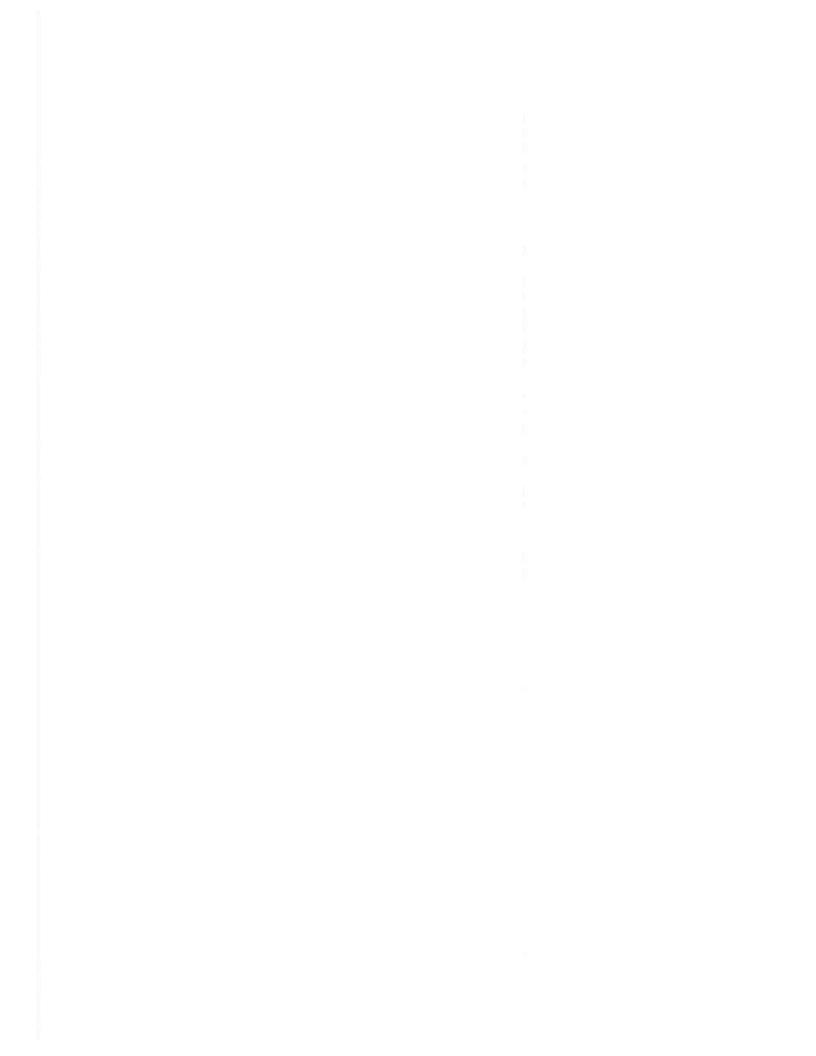
The County looks forward to addressing this issue with you and would appreciate the opportunity for a meeting to further discuss this matter.

Best Regards,

Ted Rhinehart

Deputy Chief Operating Officer/Infrastructure

DeKalb County



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### Office of the Chief Executive Officer

December 14, 2017

Zachary L. Williams Executive Assistant, Chief Operating Officer **Board of Commissioners** 

District 1 Nancy Jester

> District 2 Jeff Rader

District 3 Larry Johnson

District 4 Steve Bradshaw

District 5 Mereda D. Johnson

> District 6 Kathie Gannon

District 7 Gregory Adams

By E-Mail [Janovitz.Sara@epa.gov] and Certified Mail

Ms. Sara Janovitz, Enforcement Officer U.S. Environmental Protection Agency, Region 4 NPDES Permitting and Enforcement Branch 61 Forsyth Street, S.W. Atlanta, Georgia 30303-8960

Re:

Information Request - Section 308 of the Clean Water Act Consent Decree, Civil Action No. 1:10-CV-04039-WSD

National Pollutant Discharge Elimination System Permit Nos. GA0024147 and GA002687I: Snapfinger Creek Wastewater Treatment Facility and Pole Bridge

Creek Wastewater Treatment Facility

Dear Ms. Janovitz:

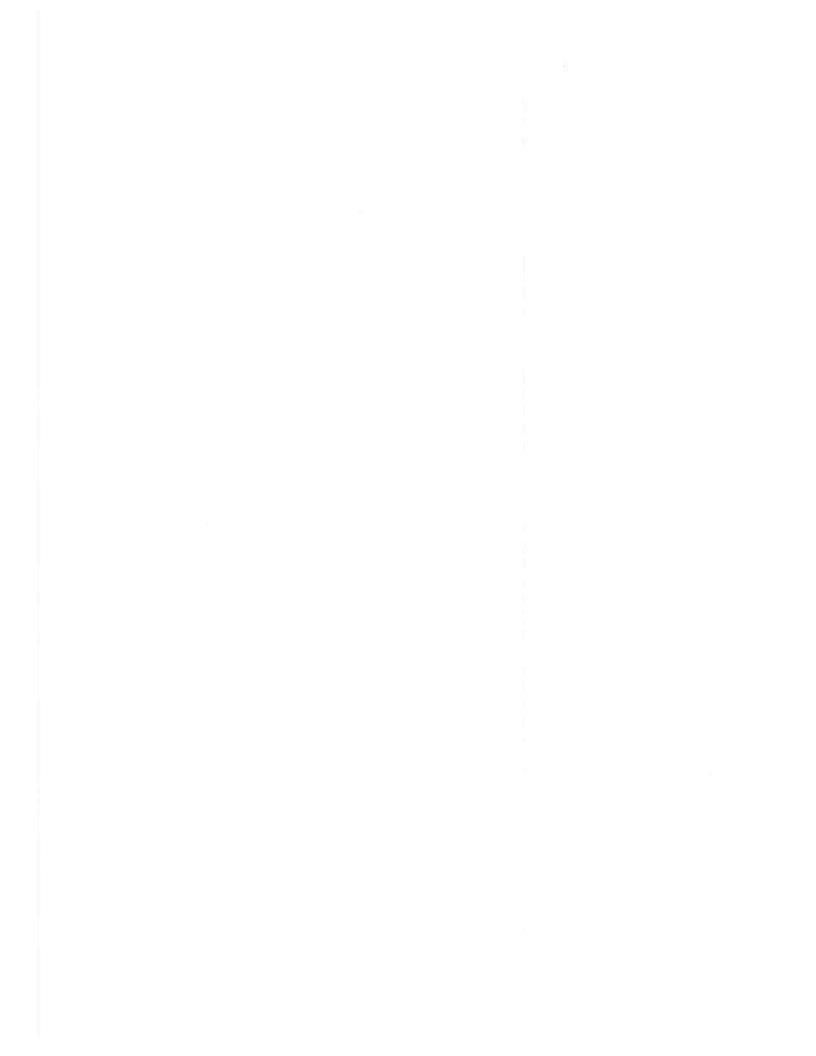
This letter provides the County's complete response to the Environmental Protection Agency (EPA) Region 4's Section 308 Request dated August 17, 2017, which the County received on August 22, 2017. Please see Attachment A, which includes the list of information EPA requested, along with the County's response to each item and references to enclosures providing documents responsive to the Section 308 Request. We have also included a complete listing of documents produced at Attachment B, as well as a disc that includes electronic copies of each responsive document. While EPA's Section 308 Request is very broad, the County has made every reasonable effort to respond to each request.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Zaehary L. Williams Chief Operating Officer

Manuel J. Maloof Center | 1300 Commerce Drive, 6th Floor | Decatur, GA 30030 | P: 404.371.2174 F: 404.687.3585 www.dekalbcountyga.gov



#### ZLW/mcw/zg Attachments

cc: O.V. Brantley

William Rhinehart Fitzgerald Veira Matthew Welch Scott Towler Darren Eastall James Capp Lewis Hays

Marzieh Shahbazaz Hsin-Sheng Yeh

#### Attachment A

EPA's Section 308 requests to DeKalb County are listed below followed, in italics, by the County's responses.

- Identify any areas likely to have sanitary sewer overflow (SSO) events using the System-Wide Flow and Rainfall Monitoring Program set forth in Paragraph 26 of the Consent Decree. Based on the analysis and results of this Program:
  - a. Identify by Sewershed, the areas with the least dry weather flow capacity.
  - b. What is the percentage of capacity in dry weather flow in the trunk lines of the Wastewater Collection and Transmission System or WCTS (as that term is defined in the Consent Decree) by Sewershed?
  - c. Identify by Sewershed, the areas with the least wet weather flow capacity.
  - d. What is the percentage of capacity in wet weather flow in the trunk lines of the WCTS by Sewershed?

DeKalb County's Response: The County has not located documents that directly respond to Item 1 under the Flow and Rainfall Monitoring Program. However, at Enclosure 1, the County provides the System-Wide Flow and Rainfall Monitoring Results report which we believe is relevant to this request. The document describes the pre-PASARP rehabilitation Rainfall Derived Inflow and Infiltration analysis and cumulative peaking factors/peak flow rates.

- Provide a copy of the contract and related scope of work documents the County used to hire CH2M to prepare the System-Wide Hydraulic Model pursuant to Paragraph 28 of the Consent Decree.
  - **DeKalb County's Response:** The initial contract and scope of work is included at Enclosure 2. The County's response to this request is not an indication that the terms of the agreement and scope of work have been satisfied.
- Provide the date when the System-Wide Hydraulic Model prepared by CH2M on behalf of the County was given to the County.

DeKalb County's Response: CH2M Hill provided the preliminary hydraulic model to DeKalb County on June 30, 2016. Enclosure 3 provides copies of communications from CH2M Hill depicting this date. As we have previously conveyed to EPA, the version of the model CH2M Hill submitted is preliminary. As CH2M Hill stated in a presentation to the County around the time the preliminary model was presented, the preliminary model was to be used for planning purposes only. (See June 21, 2016 Model Workshop Presentation Slide 39 stating "Be aware of the model assumptions and limitations, model extent, planning level model, peak flow approach limitations, GIS data quality and pending field check, limited information at lift stations.") Notwithstanding these limitations CH2M Hill presented, some of which is further repeated in other responsive documents (see responses to items 4, and 6 below), County staff began using the preliminary model for capacity connection analyses without the benefit

of the model being fully developed for that purpose and without the Governing Authority authorizing its use for that purpose. The County is working with its experts to create a fully developed model useful for capacity connections analyses.

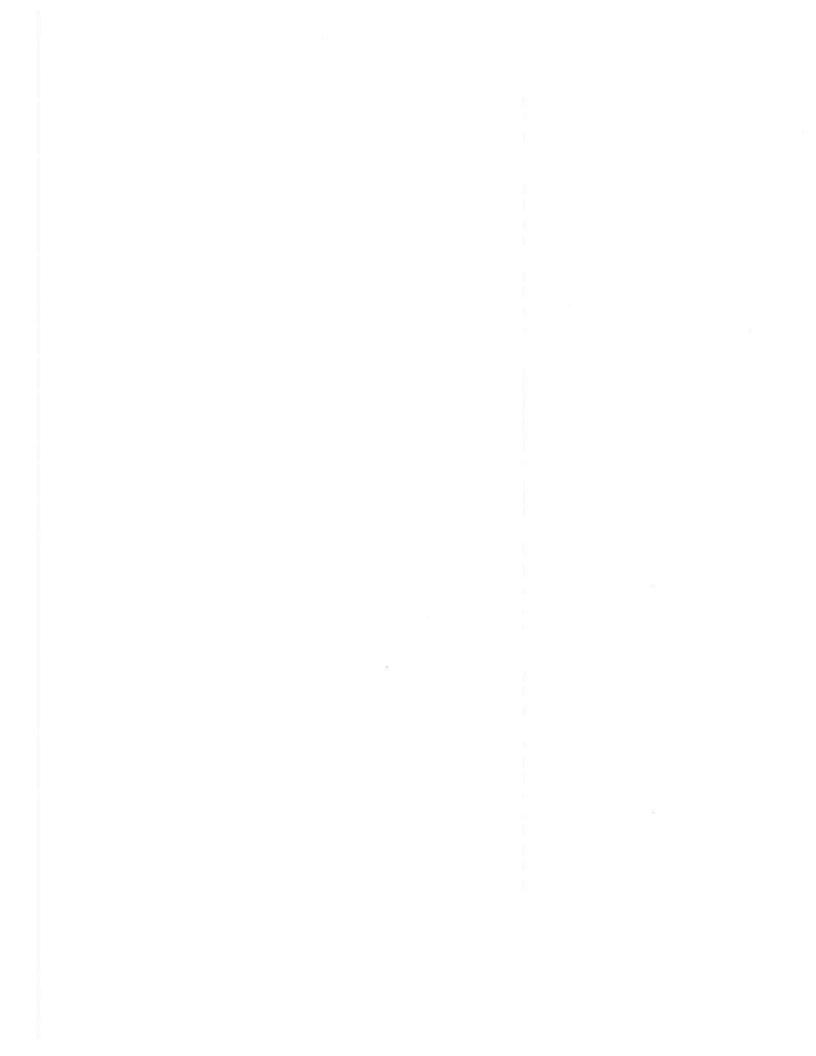
4. Provide all records (whether written or electronic) from CH2M documenting its submission of the System-Wide Hydraulic Model to the County since May 2016. Has CH2M revised, edited, or provided supplemental information to the System-Wide Hydraulic Model after its initial submission to the County? If so, when?

DeKalb County's Response: Enclosure 4 provides records received from CH2M Hill documenting its submission of the model to the Country since May 2016. These documents highlight improvements to the preliminary model that have taken place since June 2016. Updates related to the model were completed on the dates shown in the table below.

Basin/Sewershed	Date Submitted to the County
Intergovernmental - Nancy Creek	11/18/2016
Intergovernmental - Northfork Peachtree Creek	1/13/2017
Snapfinger	1/17/2017
Pole Bridge	1/20/2017
Intergovernmental - Small Sewersheds	1/27/2017
Intergovernmental - Southfork Peachtree Creek + Peavine Creek Sewersheds	3/6/2017
Pole Bridge, Snapfinger and Intergovernmental	8/22/2017
Pole Bridge, Snapfinger and Intergovernmental	11/16/2017
Pole Bridge	11/28/2017
Pole Bridge	12/1/2017
Snapfinger	12/1/2017
Intergovernmental	12/1/2017

Provide all records (whether written or electronic) of the County's and/or its contractor's efforts to calibrate and verify the System-Wide Hydraulic Model using selected monitored storm events.

DeKalb County's Response: Based on information from CH2M Hill, our understanding is that traditional wet weather calibration was not conducted. As outlined in the draft model report documents (see response to item 6 below), a wet weather dynamic model and associated wet weather calibration and verification was not done. Instead, a peak flow model (steady state) was created. Our understanding is that multiple storm events were not used to develop the peak flow rates utilized in the model. However, at Enclosure 5, we are providing information the County received from CH2M Hill supporting the peak flow model. All documents initially submitted as well as supplemental submissions are listed in Attachment B.



 Provide all records (whether written or electronic) of "Model outputs and reports" as described in Section 1.5.5.1 of the County's January 2015 System-Wide Hydraulic Model Program.

DeKalb County's Response: Provided at Enclosure 6 are copies of the first set of draft model reports the County received from CH2M Hill. Note that all three draft reports are dated December 2016; however, the County received the Polebridge report in 2016, and the Snapfinger and Intergovernmental Reports in August 2017. Provided at Enclosure 12 are copies of the second set of draft reports the County received from CH2M Hill in December 2017. The County is in the process of reviewing this second set of draft model reports. We expect they will be revised.

7. Provide the WCTS capacity conclusions in the CH2M System-Wide Hydraulic Model.

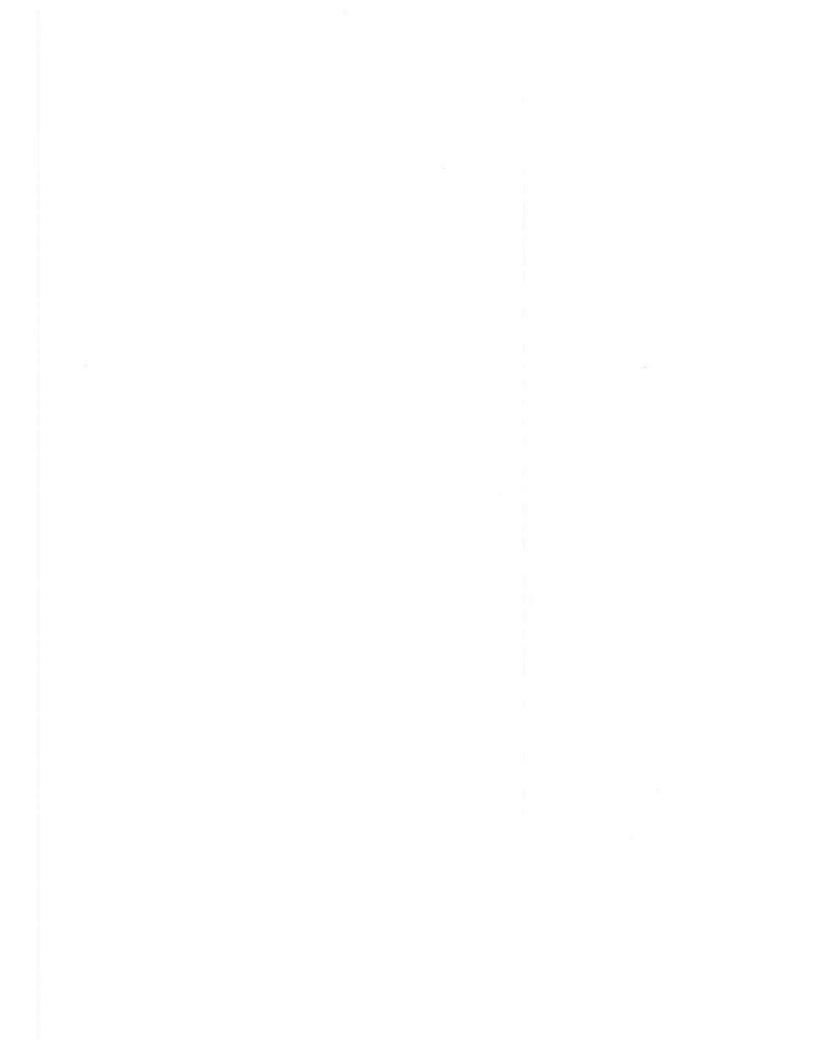
DeKalb County's Response: At Enclosure 7, we provide documents from CH2M Hill showing model results or potential conclusions. While the model outputs in Enclosure 7 show capacity concerns in certain areas, given the preliminary nature of the model, and the remaining items to be completed to ensure a fully developed model, these conclusions should be deemed preliminary. The draft model reports referenced in Enclosure 6 and 12 also provide WCTS capacity conclusions that are likewise also preliminary.

- 8. Identify the dry and wet weather capacity-limited areas identified in the CH2M System-Wide Hydraulic Model. How much of the WCTS is capacity-limited, and which parts of the WCTS are capacity-limited? How much of this capacity-limited area is in the Initial and Additional Priority Areas (as those terms are defined in the Consent Decree)? Based on the results of the CH2M System-Wide Hydraulic Model:
  - a. Identify by Sewershed the areas with the least dry weather flow capacity?
  - b. What is the percentage of capacity in dry weather flow in the trunk lines of the WCTS by Sewershed?
  - c. Identify by Sewershed the areas with the least wet weather flow capacity?
  - d. What is the percentage of capacity in wet weather flow in the trunk lines of the WCTS by Sewershed?

DeKalb County's Response: Please see responsive documents at Enclosure 8.

 Provide the date when the County provided the system-wide hydraulic model prepared by CH2M to Brown & Caldwell for review.

**DeKalb County's Response:** The County provided the System-Wide Hydraulic Model to Brown & Caldwell for review on December 12, 2016.



 Provide all records (whether written or electronic) from Brown & Caldwell regarding its findings associated with its review of the System-Wide Hydraulic Model prepared by CH2M.

**DeKalb County's Response:** The Brown & Caldwell report is provided at Enclosure 10.

11. Provide a summary of the basic assumptions and input parameters for the System-Wide Hydraulic Model. How are these assumptions different from the standard inputs that were made in the initial System-Wide Hydraulic Model?

**DeKalb County's Response:** Enclosure 11 lists a summary of assumptions CH2M Hill provided.

12. What, if any, work is outstanding regarding the System-Wide Hydraulic Model?

**DeKalb County's Response:** We are working with our internal and external experts to achieve a fully developed model. The list of work items includes:

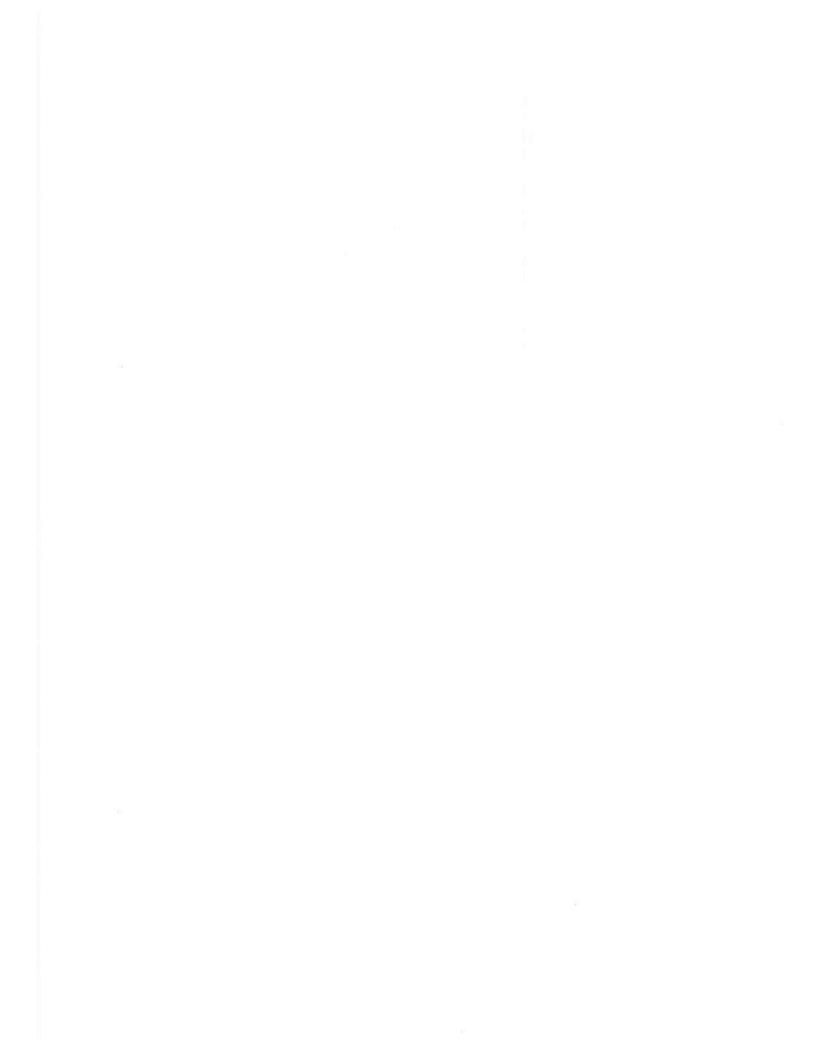
- GIS updates and field verification and related QA/QC
- Review and finalize the draft model reports
- Review, revise or create procedures and protocols to ensure proper and consistent use of the model
- Calibrate, verify and validate the model, as appropriate and/or properly document these efforts
- 13. Provide a list of all new connections or increases in flow from existing sewer service connections to the County's WCTS that were authorized on or after January 1, 2016. In addition, provide copies of all letters or correspondence regarding the authorization of such connections.

DeKalb County's Response: Please see Enclosure 13.

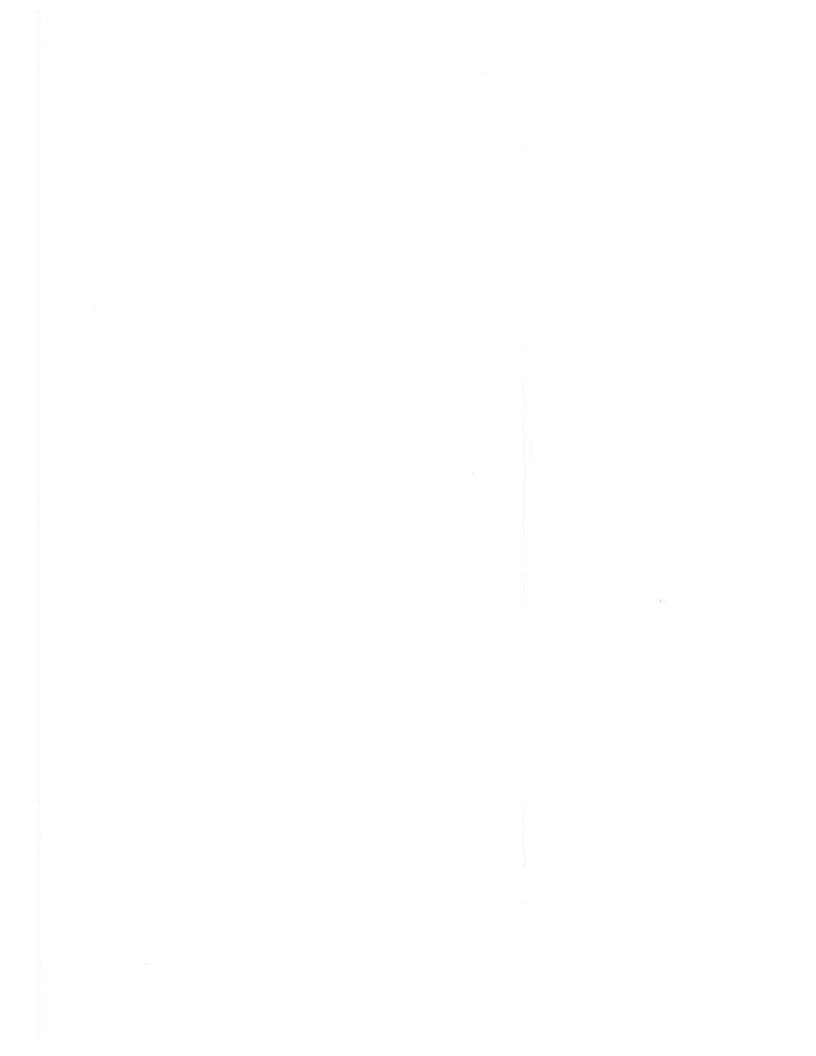
14. Provide documentation of any certification of adequate collection, transmission, and treatment capacity that was made by a professional engineer licensed in the State of Georgia for the connections referenced in Question 13 above.

DeKalb County's Response: We have provided documents in Enclosure 13 showing varying degrees of engineering support and justification for authorizations that were given. In a number of cases, some of the engineering support documentation is filed at the County separate from the authorizations themselves. These documents are voluminous. However, we can make them available for EPA's review, to the extent EPA would like to review them. Because the model is preliminary, certification is not triggered.

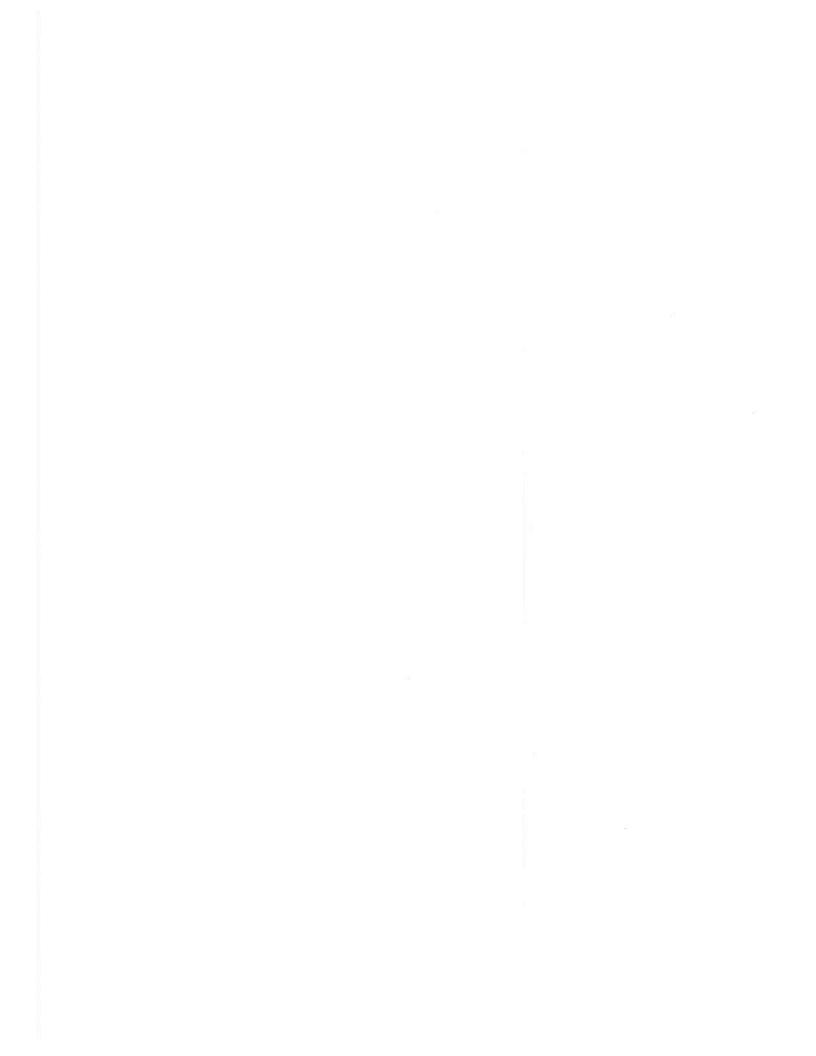
- 15. How does the County currently define "Adequate Collection Capacity," "Adequate Transmission Capacity," and "Adequate Treatment Capacity"? When were those definitions established? Prior to this date, how and when has the County defined these terms since entry of the Consent Decree?
  - **DeKalb County's Response:** Please see Enclosure 15. The County does not currently have specific definitions for "Adequate Collection Capacity," "Adequate Transmission Capacity," and "Adequate Treatment Capacity."
- 16. Provide a copy of the power point presentation the County prepared and presented to the EPA and the Georgia Environmental Protection Division at the June 28, 2017 meeting among the parties.
  - **DeKalb County's Response:** The PowerPoint presentation presented to EPA and Georgia Environmental Protection Division on June 28, 2017 is included at Enclosure 16.



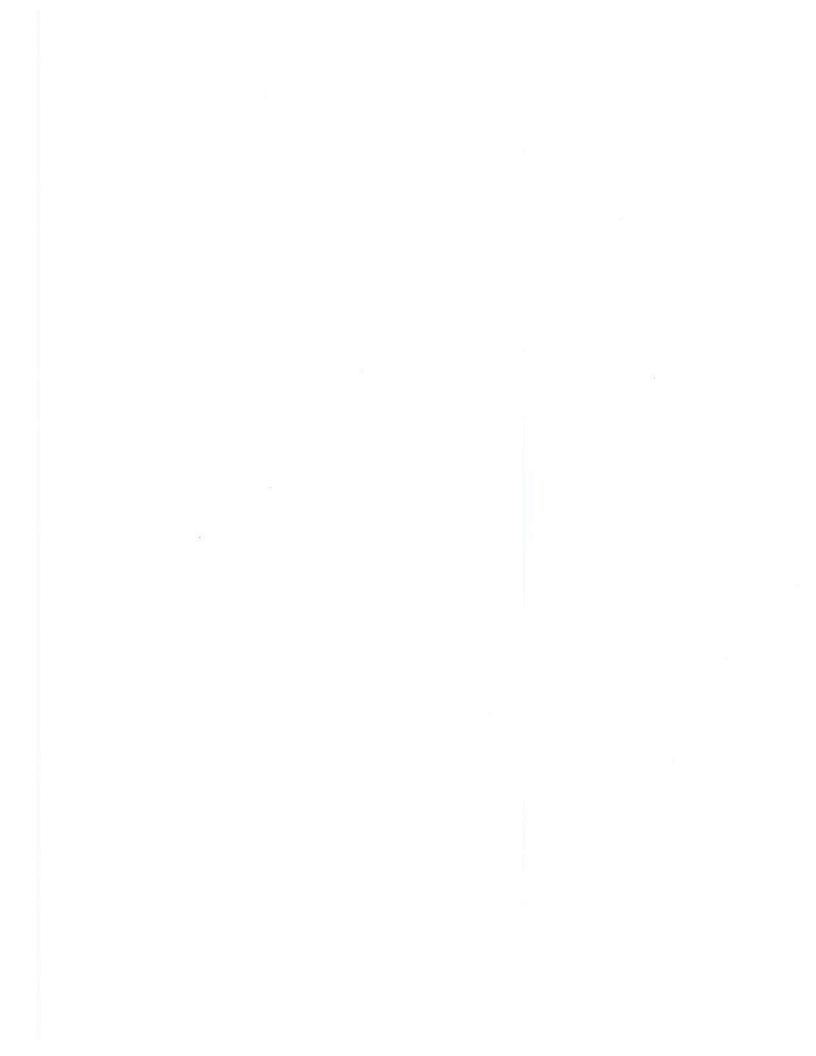
Enclosure 1	Document Name	Date Posted to WorkShare	Number of Documents	Bates Number (If necessary to find in Workshere
Enclosure 1			2	
1	Flow Monitoring Program Results Report 08052016_Final.pdf	9/20/2017		Commission of the property of the second sec
1	Draft I-I Summary Slide.pdf	9/20/2017		
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2	CH2 Proposal.pdf	9/20/2017		Extremely and the second secon
2	CH2 agreement part 1-contract.pdf	9/20/2017		
2	CDPM DRAFT WorkPlan_August 27_2014.pdf	10/9/2017		
2	Contracting Strategy + Modeling Integration 1-7-2015 v2.ppt.pdf	10/9/2017		
2	CDPM WorkPlan_June 26_2014.pdf	10/9/2017		
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3	DeKalb_IntGBasin_06292016.iwm	9/20/2017	ECE/原型性性性。	
3	DeKalb_PolebridgeBasin_06292016.hvm	9/20/2017		
,	DeKalb_SnapFingerBasin_06292016.hvm	9/20/2017		
3	DWM model files.pdf	9/20/2017		
3	DeKalb Sewer Model workshop changed to June 21st.pdf	9/20/2017		
3	DeKalb HM model files for all three basins.pdf	9/20/2017		
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4	IntG misc model update.msg	9/20/2017	NEW SALES OF CHEST OF STREET	
4	HoodCir03152017 Iwc	9/20/2017		
4	IntG misc model update.pdf	9/20/2017		
-1	FW Intrenchment Creek EXTERNAL pdf	9/20/2017		
4	FW Intrenchment Creek EXTERNAL .msg	9/20/2017		
4	DWM model files.pdf	9/20/2017		
4	FW MMADF lwc file EXTERNAL.pdf	9/20/2017		
4	DeKalb_SnapFingerBasin_06292016.hwm	9/20/2017		
4	DeKalb_PolebridgeBasin_06292016.hvm	9/20/2017		
4	DeKalb Modeling 8-24-2017 DWM model workshop_toDWM.pdf	9/20/2017		
4	DeKalb Modeling 12-09-2016 BC model workshop_draft_final_toBC.pdf	9/20/2017		
	DeKalb Sewer Model workshop changed to June 21st.pdf	9/20/2017		
4	OeKalb_IntGBasin_06292016.hvm	9/20/2017		
4	1182016 Nancy Creek Model Updata Files.pdf	9/20/2017		
4	06302016 - DWM model files in sever notification.pdf	9/20/2017		
	1222016 Northfork Paachtree Model Update Delivery pdf	9/20/2017		
A	eKalb HM model files for all three basins.pdf	9/20/2017		- VIII
	eKalb Modeling 6-21-2016 DWM model workshop_final.pdf	9/20/2017		
	6292015- DeKaib HM model files for all three basins.pdf	9/20/2017		
	1272017 Misc., Intergovernmental Model Update Delivery pdf			
	6212016- Hydraulic Model Workshop pdf	9/20/2017		
	3012017 Southfork Peachtree Model Update Delivery pdf	9/20/2017		



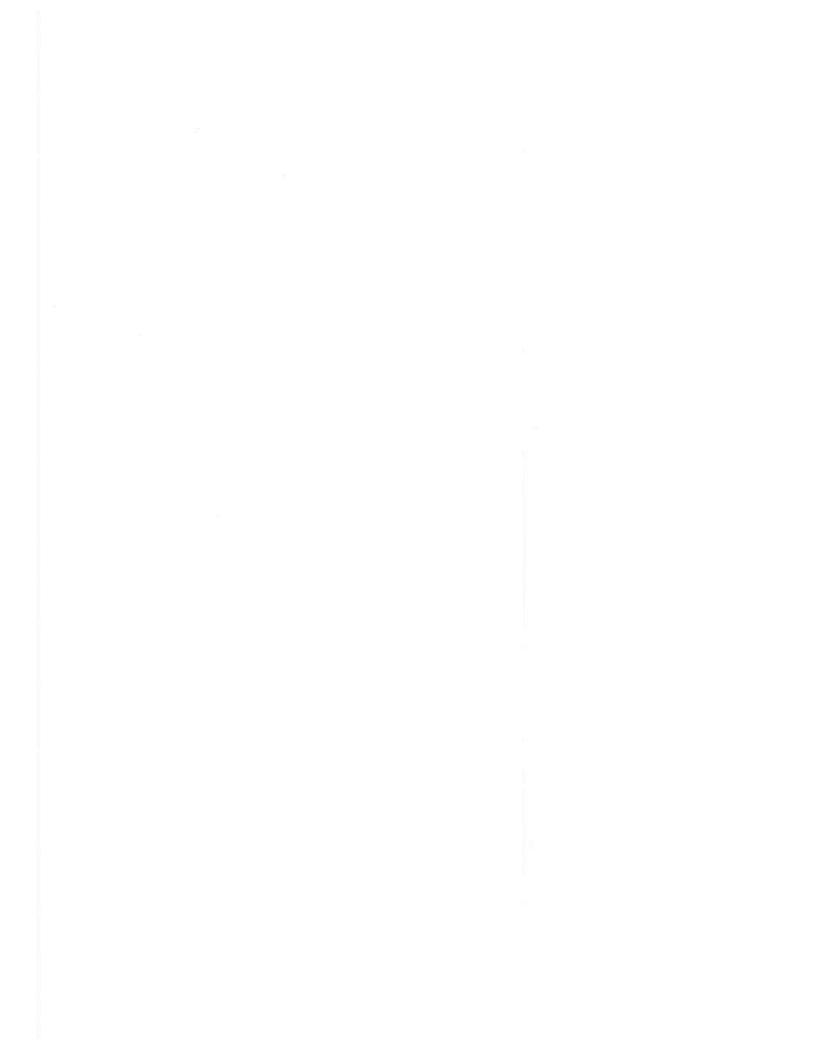
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4	03062017 Southfork Peachtree Model Update Delivery.pdf		Mumber of Documents	Bates Number (If necessary to find in Workshare
4	01252017 Pole Bridge Model Update Delivery.pdf	9/20/2017		
4	SF updated model .msg	9/20/2017		
4	SF updated model.pdf	9/20/2017		
4	01172017 Snapfinger Model Update Delivery.pdf	9/20/2017		
4	1132017 Northfork Peachtree Model Update Delivery.pdf	9/20/2017		
4	RE SFPC model update per 11-11-2016 GIS.pd/	9/20/2017		
4	RE SFPC model update per 11-11-2016 GIS.msg	9/20/2017		
4	P8 model update lwc file (per 11-11-2016GIS and Dec of 2016 Field survey).msg	9/20/2017		
4	NFPC updated model based on 11-11-2016GIS and December Field Check.pdf	9/20/2017		
4	PB model update fwc file (per 11-11-2016GIS and Dec of 2016 Field survey) pdf	9/20/2017		
4	NFPC updated model based on 11-11-2016GIS and December Field Check.msg	9/20/2017	2.44	
4	NCR GIS update model.msg	9/20/2017		
4	NCR GIS update model.pdf	9/20/2017		
4	MMADF_2017.hvc	9/20/2017		
4	MMADF lwc file .pdf	9/20/2017		
4	RE Periodic model updates based on ongoing collection system sewer survey data - ACTION  TEAS of	9/20/2017		
4	The state of the s	10/11/2017		
4	Request for Model Calibration Files.pdf	10/11/2017	- 250	
4	Updated Model Schedule 11_10_16.pdf	10/11/2017		
	Update on the schedule of thydraulic Model.pdf	10/11/2017		
	Update GIS data.pdf	10/11/2017		
4	Periodic model updates based on ongoing collection system sewer survey data - ACTION ITEMS not	10/11/2017		
4	NFPC_Flow_Balance04192016_summarytab.pdf	10/11/2017		
	Periodic Model Updates.pdf	10/11/2017		
	Polebridge Basin Flow Calculation 08062015_FRNAL_Summary tab.pdf	10/11/2017		
	NFPC model update (attachment would not open).pdf	10/11/2017		
4	Meeting 9-20-16 email 2.pdf	10/11/2017		
	NANCY_Flow_Balance01082016_summarytab.pdf	10/11/2017		
	Model update.pdf	10/11/2017		
4	NCR GIS update model.pdf	10/11/2017		
4	Model schedule.pdf	10/11/2017		
4	Hydraulic Model Coordination Monthly Meeting Minutes 12062016.pdf	10/11/2017		
	Hydraulic Model Coordination Monthly Meeting Minutes 10252016.pdf	10/11/2017		
	Hydraulic Model Coordination Monthly Meeting Agenda 12062016.pdf			
	Hydraulic Model Coordination Monthly Meeting Agenda 10252016.pdf	10/11/2017		
	Hydraulic Model Coordination Monthly Meeting Agenda 09202016.pdf	10/11/2017		
	Hydraulic Model Coordination Monthly Meeting Agenda 09202016 final.pdf	10/11/2017		
	GIS Model Update pdf	10/11/2017		
	DeKalb Sewer Model Status Update.pdf	10/11/2017		
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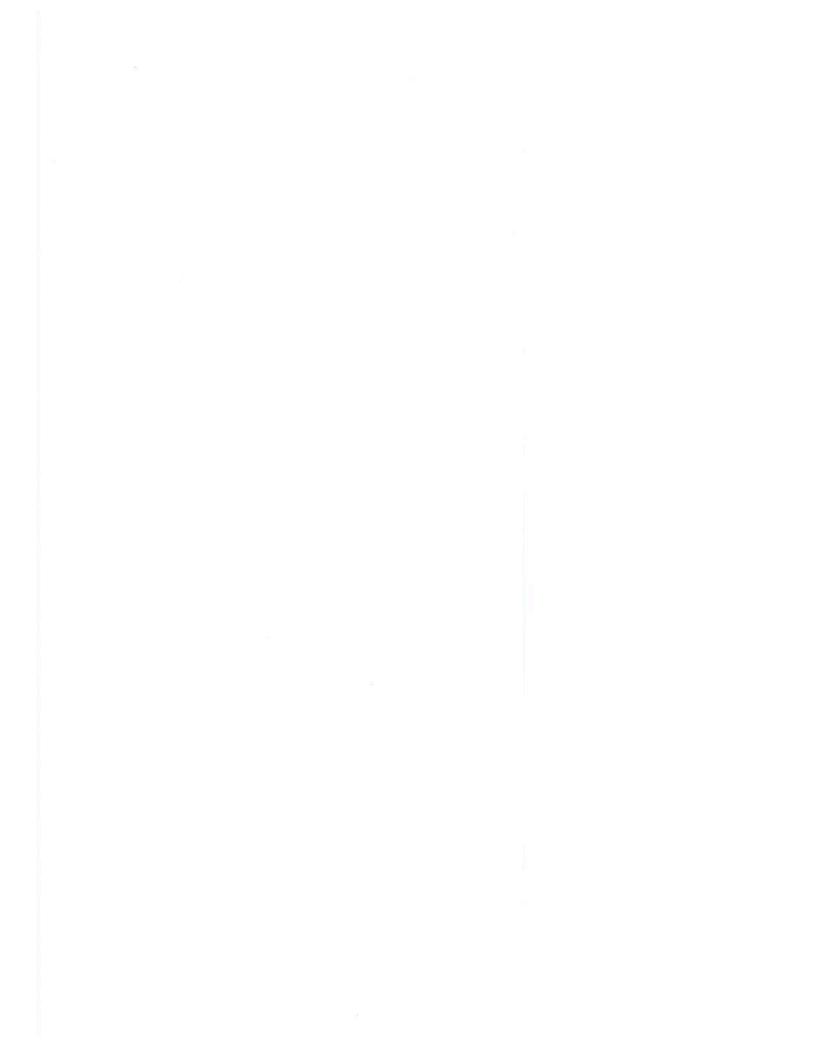
Enclosure	Document Name	Date Posted to WorkShore	Number of Documents	Bates Number (if necessary to find in Workshare
4	Hydraulic Model Coordination Monthly Meeting Agenda 09202016 email 2.pdf	10/11/2017		The second secon
4	email Periodic model updates based on ongoing collection system sewer survey data[2].pdf	10/11/2017		
4	DeKalb HM Weekly update_08222016.pdf	10/11/2017		
4	Bubble Diagram.pdf	10/11/2017		
4	AppM1_Flow Meter Diagrams_9-22-16.pdf	10/11/2017		
4	DeKalb HM Weekly update_05242016.pdf	10/11/2017		
4	Updated Model Schedule 11_29_16.pdf	10/11/2017		
4	11222016 Northfork Peachtree Model Update Delivery.pdf	11/1/2017		
4	01132017 Northfork Peachtree Model Update Delivery.pdf	11/1/2017		
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5	DeKalb Modeling Guidance_CDPMTinternal_workshop3_10232015.pdf	9/20/2017	244	
5	DeKalb CD Hydraulic Modeling_PF_Pilot_toB&C.pdf	9/20/2017		
5	PBbasinHydraulicModelApplicationReport_Draft_section5.1.pdf	9/20/2017		
5	MISC_PF03237016.xlsx	10/9/2017		
5	MISC_PF03232016.pdf	10/9/2017		
5	Nancy_Peaking Factor Calculation03182016_Final.alsx	10/9/2017		11
5	Nancy_Peaking Factor Cakulation03182016_Final.pdf	10/9/2017		
5	SFPC_PF04122016.pdf	10/9/2017		
5	SFPC_PF04122016.xkx	10/9/2017		
5	SF_PF_forModelUpdate_2015_85%GWI_03172016_Revised.pdf	10/9/2017		
	PF_noScaleUP_comparisonStatistics03282017_hlu.xlsx	10/9/2017		
	SF_PF_forModeIUpdate_2015_85%GWI_03172016_Revised.xlsx	10/9/2017		VIII - 10 - 10 - 10 - 10 - 10 - 10 - 10 -
	PB_Pasking Factor Calculation 03232016 - Final.pdf	10/9/2017		
5	PB_Peaking Factor Calculation 03232016 - Final.xlsx	10/9/2017		
5	NFPC_PF03182016.pdf	10/9/2017		
5	NFPC_PF03182016.xtsx	10/9/2017		
5	PF_noScaleUP_comparisonStatistics03282017_hlu.pdf	10/9/2017		
	DeKeib Model Discussion.pdf	10/11/2017		
5	Nancy Creek Sewer Analysis.pdf	10/11/2017		
5	DeKalb County Model Discussion.pdf	10/11/2017		
5	3770 3780 Covington Hwy Survey Request.pdf	10/11/2017		
	4217 Carver Circle Survey REquest.pdf			
71000	3757 Chamblee Dunwoody Road Capacity Request pdf	10/12/2017		
	3716 Stewart Road Invert Verification Request.pdf	10/12/2017		
	3635 Briarcliff Road Survey Requests_09202016.pdf	10/12/2017		
	3698 Sycamore Bend Survey Request.pdf	10/12/2017		
	3684 3693 Spring Street Survey Request_011122017 pdf	10/12/2017		
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	SS13 Regalwoods Drive Capacity Request field verification request.pdf	10/12/2017		



Enclosure	Document Name	Date Posted to WorkShare	Number of Documents	
5	3352 North Druid Hills Road Map Requests.pdf	10/12/2017	Humber of Documents	Bates Number (If necessary to find in Workshare
5	3280 Chamblee Dunwoody Road Model Run_07052017 pdf	10/12/2017		
5	3423 Lawrensville Hwy Survey Request pd!			
5	3497 Chamblee Tucker Rd Project Survey Requests pdf	10/12/2017		
5	3350 Chamblee Dunwoody & 5251 Peachtree Survey Request.pdf	10/12/2017		
5	3051 Lumby Drive Survey requests.pdf	10/12/2017		
5	2700 E. College Ave Survey Request.pdf	10/12/2017		
5	3280 Chamblee Dunwoody Rd - Animal Shelter Certification Package [Extract].pdf	10/12/2017		
5	3274 Northlake Parkway Survey Request.pdf	10/12/2017		
5	3280 Chambles Dunwoody Rd Capacity Evaluation Report_07052017.pdf	10/12/2017		
5	21.71 Lavasta Rd. Survey Request_not use pdf	10/12/2017		
5	2171 Lavasta Rd. Survey Request-Revised 09202016.pdf	10/12/2017		
5	2700 Apple Valley Survey Request.pdf	10/12/2017		
5	2608 Laurelwood Road Survey Request.pdf	10/12/2017		
5	2090 North Decatur Road Fernando's Fresh Mex.pdf	10/12/2017		
5	2030 Pernoshal Court Sirveu Request pdf	10/12/2017		
5	1989 Dering Circle Project Survey Request.pdf	10/12/2017		
5	1880 Lawrencevill Survey Requests.pdf	10/12/2017	C 1/95353317.1	
5	1727 Mountaki Industrial Blyd. Survey Request.pdf	10/12/2017		
5	1764 North Akin Drive SFR Septic to Sewer pdf	10/12/2017		
5	1111 Hammond Dr Capacity Evaluation Report_06192017.pdf	10/12/2017		
5	1405 Clifton Street Survey Requests.pdf	10/12/2017		
5	1111 Harnmond Drive Capacity Requests Model Run_06192017.pdf	10/12/2017		
5	1665 Scott Blvd survey Request.pd/	10/12/2017		
5	1413 Nelms Drive Survey Request.pdf	10/12/2017		
S	120 W. Trinky Project Survey Requests_08252016.pdf	10/12/2017		
s	Verify pipe sizes in Snapfigure Basin_15-030.pdf	10/12/2017		
5	84 Perimeter Center East Branch Perimeter Center East (Extract).pdf	10/12/2017		
	973-1123 Church Street Survey Request.pdf	10/12/2017		
	211 Perimeter Summit Survey Request pdf	10/12/2017		
	NFORK FM data Analysis.pdf	10/12/2017		
	Katle Kerr Dr_South Columbia Drive Survey Request pdf	10/12/2017		
	Pipe size field confirmation at 18-124.pdf	10/12/2017		
	NANCY22 18-327-s120.pdf	10/12/2017		
	NANCY-Temp4 18-327-5033-42 Flow Data.pdf	10/12/2017		
	Final Certification Package 06152017 - 1111 Hammond Dr (Extract) pdf	10/12/2017		
	7460 Redbud Loop Capacity Certification Package (Extract).pdf	10/12/2017		
		10/12/2017		
	Competed Certification Package 06192017 - 4004 Summit Blvd (Extract).pdf	10/12/2017		
	il5_Model Discrepancy_Downstream of Dresden Area_Brookhaven.pdf	10/12/2017		



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5	Final Approved SAP - 3SS3 Brycewood Drive (Extract).pdf	10/12/2017		Total State of the Land of the Column of the
5	5579 Buford Hwy Project Suvery Request.pdf	10/12/2017		
5	5419 Chamblee Dunwoody Road Survey Request.pdf	10/12/2017		
5	4549 Chambles Dunwoody Road pipe Verfication request.pdf	10/12/2017		
	5537 Peachtree Road Capacity Survey Request.pdf	10/12/2017		
5	5287 Covington Hwy (PAWS Atlanta).pdf	10/12/2017		
5	724 Rock Chaple Rd. Flow Monitor Request.pdf	10/15/2017		
5	survey tarenceville.pdf	10/16/2017		
5	survey chamblee pdf	10/16/2017		
5	survey 5579 Buford.pdf	10/16/2017		
S	survey larenceville - Copy.pdf	10/16/2017	( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )	
5	survey dresden project.pdf	10/16/2017		
5	survey 3635 Briarcliff.pdf	10/16/2017		
5	SFORK20.pdf	10/16/2017		
5	survey 1989 Deering.pdf	10/16/2017		
5	survey 3350 and 5251.pdf	10/16/2017		
5	Survey 3350 Chambles.pdf	10/16/2017		
5	survey 3350 and 5251 - Copy.pdf	10/16/2017		
5	pipe survey callaway 2.pdf	10/16/2017		
5	pipe survey callaway.pdf			
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5	nfork42 - Copy.pdf	10/16/2017		
5	nfork42.pdf			
5	field vertified sso.pdf	10/16/2017		**
5	flow monitor 1989 dering.pdf			
5	flow monitor northfork.pdf	10/16/2017		
5	Now meter callaway 3.pdf	10/16/2017		
5	flow meter callaway.pdf	10/16/2017		
	emergency survey.pdf	10/16/2017		
5	emergency flow monitor.pdf	10/16/2017		
5	emergency survey - Copy.pdf	10/16/2017		
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	3900 Motors Industrial Way Flow Monitor Request.pdf	10/16/2017		
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	3635 Briarcliff Road Survey Requests_09202016.pdf	10/16/2017		



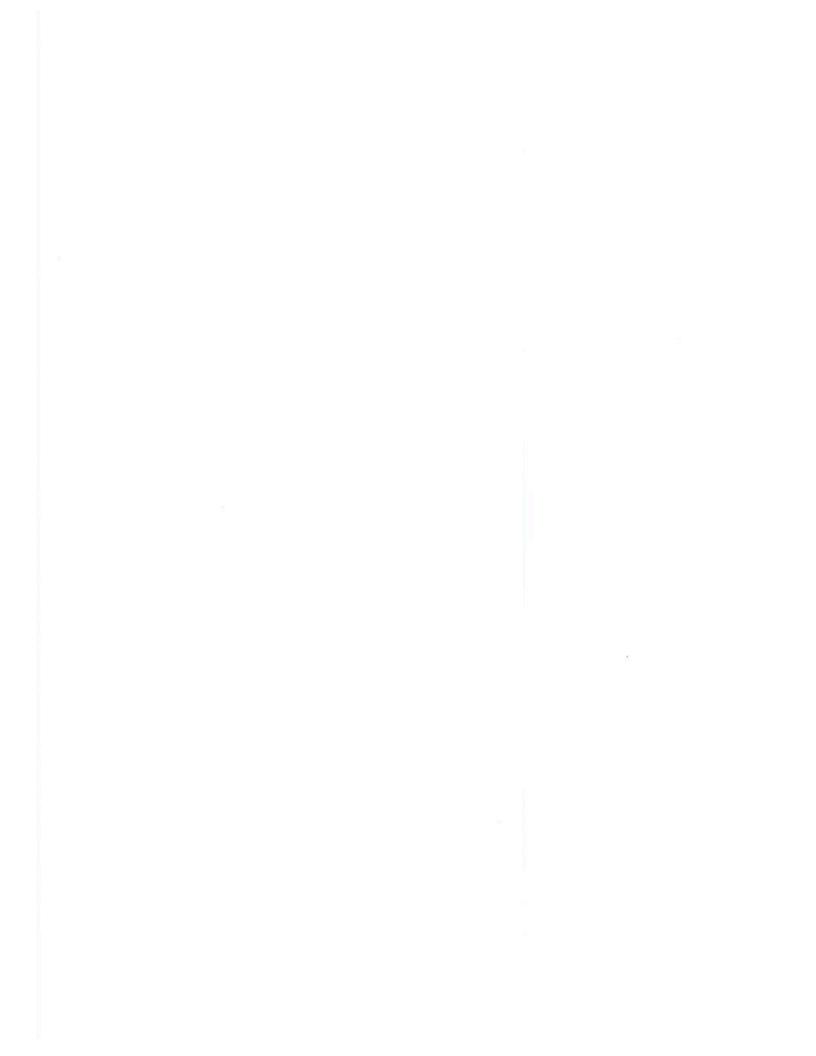
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5	2171 Lavasta Rd Flow Monitor Installation.pdf	10/15/2017		the state of the s
S	3352 North Druil Hill Flow meter location.pdf	10/15/2017		
5	3635 Briarcliff Rd Flow Monitor Request.pdf	10/16/2017		
5	724 rockchapel data Jan to April 2016.pdf	10/15/2017		
5	PF Model Calibration Verification Validation Procedures 10-6-17.pdf	10/20/2017		
5	Model Update Procedures_hlu11112016_v2.pdf	10/20/2017		
5	PF Model Calibration Verification Validation Procedures updated 18-10-17.pdf	10/20/2017	-	
5	Lift Stations Peak Flow validation 02092016 xlsx	10/20/2017		
5	Lift Stations Peak Flow validation 02092016.pdf	10/20/2017		
5	PF_noScaleUP_comparisonStatistics03282017_hluRev.pdf	10/20/2017		
5	PF validation Example.pdf	10/20/2017		
5	RE Flag and UserNumber UserText for 2017 FV Model Update.pdf	10/20/2017		
5	RE Negative Slope in Updated model file at Nancy Creek [EXTERNAL].pdf	10/20/2017	7/2000 - 11/10/10/10/10/10/10/10/10/10/10/10/10/1	
5	PF_noScaleUP_comparisonStatistics03282017_hluRev.xlsx	10/20/2017		
S	18-057-s01918-057-s023_CrossingD5_1_001.pdf	10/20/2017		
5	RecordSSO_for Verification_GIS.pdf	10/20/2017		
5	18-057-s01918-057-s023_BankO5_1_001.pdf	10/20/2017		
5	SnapfingerBasinHydraulicModelApplicationReport_Section3.4.pdf	10/20/2017		www.econes
5	18-057-s01918-057-s023_BankUS_1_001.pdf	10/20/2017		
5	18-057-s019_18-057-s023_Pipespan_1_001.pdf	10/20/2017		
5	18-057-s019_18-057-s023_Pipesupport1_1_001.pdf	10/20/2017		
5	18-057-s019_18-057-s028.pdf	10/20/2017		
5	18-057-s01918-057-s023_CrossingUS_1_001.pdf	10/20/2017		
5	18-057-s01918-057-s023_Pipe support2_1_001.pdf	10/20/2017		
5	18-057-s028_18-057-s029_CrossingOS_1_001.pdf	10/20/2017		
5	18-057-s028_18-057-s029_BankUS_1_001.pdf	10/20/2017		
5	18-057-s028_18-057-s029_BankDS_1_001.pdf	10/20/2017		
5	18-057-s02818-057-s029_Defects_1_001.pdf			
705.15	18-057-s028_18-057-s029_CrossingUS_1_001.pdf	10/20/2017		
0.004	18-057-s028_18-057-s029_Pipespan_1_001.pdf	10/20/2017		
020 100	AddtionalFieldSurvey Summary.pdf	10/20/2017		
5	20170919_DeKalb Field Check Verification - Master.xlxs	10/20/2017		
	20170919_DeKalb Field Check Verification - Master.pdf	10/20/2017		
	18-057-1028_18-057-1029_Pipesupport2_1_001.pdf	10/20/2017		
	Combo_PipeJump.pdf	10/20/2017		
	Combo_NegativeSlopes.csv	10/20/2017		
	Combo_PipeJump.cry	10/20/2017		
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	Confirmed Negative Slopes (EXTERNAL).pdf	10/20/2017		

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5	Breakdown of Model Network Updates_XZ_Cleancopy.pdf	10/20/2017	1007.00.00.00	The same of the sa
5	Confirmed Negative Slopes (EXTERNAL) .msg	10/20/2017		
5	Field Check Verification Tracking Master10112017.pdf	10/20/2017		
5	DeKalb Mapping - Interim Deliverable 7 EXTERNAL .msg	10/20/2017		
5	DeXalb Mapping - Interim Deliverable 7 (EXTERNAL).pdf	10/20/2017		
5	FW 18-057-s019_18-057-s028 & 18-057-s028 to 18-057-s029 EXTERNAL .msg	10/20/2017		
5	FW 18-057-s019_18-057-s028 & 18-057-s028 to 18-057-s029 [EXTERNAL].pdf	10/20/2017		
5	FW 18-105-s209 EXTERNAL .msg	10/20/2017		
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S	FW Smaller DS field verification list 08 2017.msg	10/20/2017		
5	Letter Report - 9-20-2017.pdf	10/20/2017		0000
5	FW Pipe Size Change [EXTERNAL] pdf	10/20/2017		
5	FW Smaller DS field verification list 08 2017.pdf	10/20/2017		
5	Interim Deliverable 7 - Appendix 1.pdf	10/20/2017		
5	FW 18-105-s209 [EXTERNAL].pdf	10/20/2017		
5	1727 Mountain Industrial Blvd. Survey Request.pdf	11/1/2017		
5	FW- Survey requests for downstream of requested property - 3497 Chamblee Tucker Rd.	11/1/2017		DC 308 006341
5	Survey request for 973-1023 Church Street Capacity Request	11/1/2017		DC 308 006335
5	2700 E. College Survey Request	11/1/2017		DC 308 006334
5	Nancy G1 Followup Tab#1.pdf	11/1/2017		DC 308 006382
5	3352 North Druid Hills Road_Pending Filed Verification.xlsx	W. 10 (00 (00 (00 (00 (00 (00 (00 (00 (00		DC 308 006383
5	3274 Northlake Parkway Survey Request	11/1/2017		DC 308 006332
5	RE. HON1 is 42" not 30" change form scanned tornorrow.	11/1/2017		DC 308 006333
5	Survey Request for 3553 Brycewood Drive capacity request	11/1/2017		OC 308 006381
5	RE. USF15 18-124-1053	11/1/2017		OC 308 006339
5	1727 Mountain Industrial Blvd. Survey request - not urgent not on top priority	11/1/2017		OC 308 005337
	Survey request for 2030 Pernoshal Court Capacity Request	11/1/2017		OC 308 006340
and the same of th	Pipe size confirmation at downstream of USF15 18-124-s053	11/1/2017		XC 308 006338
	RE: SFPLNTB - Map shows 52" but field verified at 54" - change form tomorrow	11/1/2017		OC 308 006320
	No.pdf	11/1/2017		C 308 006319
5	Pipe size field confirmation at 18-124.pdf	11/1/2017		C 308 006330
2000	3352 North Druid Hills Road_Pending Filed Vertification.xlsx	11/1/2017		C 308 006322
	3423 Lawrensville Hwy Capacity Request – Survey Request	11/1/2017		C 308 006332
	Scanned from a Xerox Multifunction Device pdf	11/1/2017	o	C 308 006324
	Manholes_DECA_SWR.shp	11/1/2017		C 308 006325
	Manholes_DECA_SWR.shp.xml	11/1/2017		C 308 006308
	Manholes_DECA_SWR.shx	11/1/2017	D	C 308 006309
		11/1/2017	0	C 308 006307
	Manholes_DECA_SWR.sbn	11/1/2017	D	C 308 006306
	Survey requests for downstream of requested property - 3497 Chamblee Tucker Rd.	11/1/2017		C 308 006318

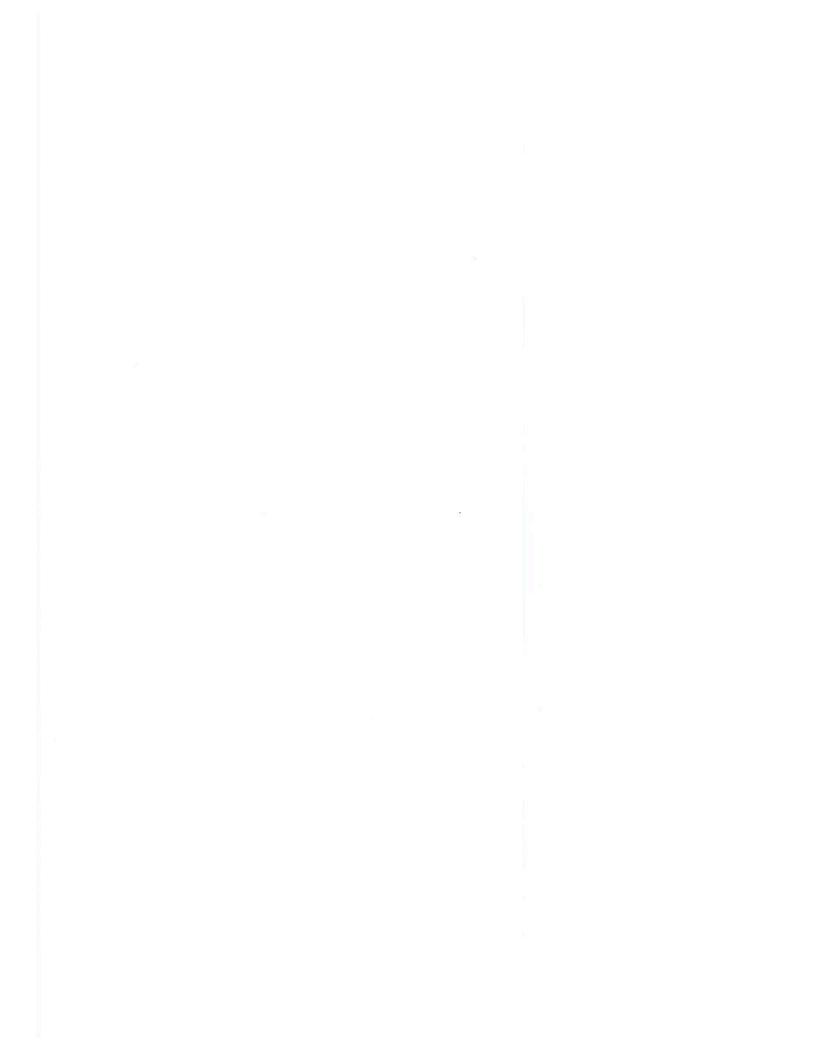
· Communication	Document Name	Date Posted to WorkShere	Mumber of Documents	Bates Number (If necessary to find in Workshare
	Capacity Assurance project Survey Requests	11/1/2017	The state of the s	DC 308 006316
5	Manholes_DECA_SWR.dbf	11/1/2017		DC 308 006305
5	Emergency survey request from Assistant Director Sandra Glenn	11/1/2017		
5	Survey Requests for 1880 Lawrenceville Hwy - Southfork Peachtree sewereshed	11/1/2017		DC 308 006317
5	RE: 1035, 1045, 1055, 1065 Lenoz Park Blvd	11/1/2017		DC 308 006315
5	Manholes_DECA_SWR.shp.xml	11/1/2017		DC 308 006310
5	Northfork Peachtree Capacity Requests - Updated Model Rerun C	11/1/2017		DC 308 006309
5	GravityMains_DECA_SWR.shp	11/1/2017		DC 308 006314
5	GravityMains_DECA_SWR.sbx			DC 308 006302
5	GravityMains_DECA_SWR.sbn	11/1/2017		DC 308 006301
5	GravityMains_DECA_SWR.dbf	11/1/2017		DC 308 005300
5	GravityMains_DECA_SWR.shp.xml	11/1/2017		DC 308 006299
5	Manholes_DECA_SWR.shx	11/1/2017		DC 308 006303
5	GravityMains_DECA_SWR.shx	11/1/2017		DC 308 005298
5	Questions 5 6 and 8 emergency flow monitor carver cir.pdf	11/1/2017		DC 308 006304
5	Questions 5 6 and 8 emergency flow monitor pdf	11/1/2017		DC 308 006245
S	Questions 5 6 and 8 survey chamblee.pdf	11/1/2017		DC 308 006242
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	Questions 5 6 and 8 survey 3350 and 5251 - Copy.pdf	11/1/2017		DC 308 D06244
	Questions 5 6 and 8 flow monitor nancy creek.pdf	11/1/2017		DC 308 006239
	Questions 5 6 and 8 flow monitor 1989 dering.pdf	11/1/2017		DC 308 006297
	Questions 5 6 and 8 emergency survey pdf	11/1/2017		DC 308 006240
	Questions 5 6 and 8 capacity assurance project.pdf	11/1/2017		DC 308 006238
	FW- Decatur Sewer Survey and Verification	11/1/2017		OC 308 006236
5	Potential large Inflow and Infiltration from flow meter data. Need some action to restore	11/1/2017		OC 308 006297
The second second	the system canacity FW: Updated GIS Data	11/1/2017	,	OC 308 006271
		11/1/2017		OC 308 006270
	N Decatur & Scott Blvd Dry and Wet Weather Presentation_09262016.pdf  Updated Modeling Schedule	11/1/2017		OC 308 006272
SINK - All SHEET	Model Update	11/1/2017	t	OC 308 006264
	NFPC model update	11/1/2017	C	OC 308 006265
		11/1/2017		C 308 006261
	Update on the schedule of Hydraulic Model	11/1/2017		C 308 006263
	Periodic Model Updates - GIS fields needed for Model Import	11/1/2017		C 308 006262
and the second second	survey Request for 3350 Chamblee Dunwoody & 5251 Peachtree Industrial Projects faid Verification needed for a SSO priority Area - Questionable connection in GIS and	11/1/2017		C 308 006258
	1000	11/1/2017		C 308 006255
	V Ponce Sewer Map Clarifications.pdf	11/1/2017		C 308 006256
	E. Periodic model updates based on ongoing collection system sewer survey data - CFION ITEMS	11/1/2017		
	1222016 Northfork Peachtree Model Update Delivery.pdf	11/1/2017		C 308 006259
5 0	3012017 Southfork Peachtree Model Update Delivery.pdf	11/1/2017	p	C 308 006254

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5	01172017 Snapfinger Model Update Delivery.pdf	11/1/2017	West Control of the C	DC 308 006251
5	01132017 Northfork Peachtree Model Update Delivery.pdf	11/1/2017		
5	Questions 5 6 and 8 flow monitor lumby drive - Copy.pdf	11/1/2017		DC 308 006253
5	Question 4 Hydraulic Model Coordination Monthly Meeting Minutes 12062016.pdf	11/1/2017		DC 308 005246
5	Item 12 - 082017_GISUpdate_Summary09182017.xlsx	11/3/2017		DC 308 006247
5	Dresden Survey Requests_08262016.pdf	11/3/2017		DC 308 006386
5	Evans Mili Road Field Verification Request.pdf	11/3/2017		DC 308 006387
5	Item11_ModelAssump_Summary_June2016Model.pdf	11/3/2017		DC 308 006403
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6	SnapfingerBasinHydraulicModelApplicationReport.pdf	9/20/2017		
6	RE Modeling Reports EXTERNAL pdf	9/20/2017		
6	IntGovBasinHydraulicModelApplicationReportpdf	9/20/2017		
6	NancyCreek_PASARP.pdf	9/20/2017		
6	Hydraulic Modeling Draft Reports.pdf	10/9/2017		
6	ModelExport.zip	10/9/2017		
6	FW Package 5 NFPC mini model upsizing and Scenario 2 SSO shape files.msg.pdf	10/9/2017		
6	FW Package 5 NFPC mini model upsizing and Scenario 2 SSO shape files.msg	10/9/2017		
6	Snapfinger_Debottleneck_noGreenSt_ProjectSummary_toPASARP.pdf	10/9/2017		
6	SF_PASARP_DebottleNeckCandidateProject_excludeGreenStr.xisx	10/9/2017		2000-
6	Snapfinger Debottleneck projects (exclude Green St area) PASARP delivery.pdf	10/9/2017		
6	Snapfinger Debottleneck projects (exclude Green St area) PASARP delivery.msg	10/9/2017		
6	Snapfinger_Debottleneck_noGreenSt_ProjectSummary_toPASARP.xlsx	10/9/2017		
6	P8basinHydraulicModelApplicationReport (2).pdf	10/9/2017		
6	HancyCreek_PASARP.alsx	10/9/2017		
6	PBbasinHydraulicModelApplicationReport_draft_DWF calibration.pdf	10/9/2017		
6	SF_PASARP_DebottleNeckCandidateProject_excludeGreenStr.pdf	10/9/2017		
	RE Model Technical Review - Additional Information Request.pdf	10/9/2017		
	2. 20171201IntGovBasinHydraulicModelApplicationReportDraftV2.pdf	10/9/2017		
6	20171201PBbasinHydraulicModelApplicationReportDraftV2.pdf	12/5/2017		
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	DeKalb CEO Hydraulic Model Presentation_final.pdf	10/9/2017		
	Skyland Trail Young Adult Campus_Capacity analysis.pdf	11/3/2017		DC 308 006425
-	RE: Skytand Trail Young Adult Campus	11/3/2017		DC 308 006417
	w: Repetitive sewage spills in Decatur	11/3/2017		DC 308 006410
	wd: 1882 Clairmont Road Sewer Capacity	11/3/2017		OC 308 006413
7	lancy Creek Updated Peak Flow Model Run - Capacity Restricted Segment Summary	11/3/2017		7C 300 W0413



7	Document Name	Date Posted to WorkShare	Number of Documents	Bates Number (If pacessary to find in Workshare
7	RE: Date by when we can have the map of non-capacity restricted areas	11/3/2017	The second secon	DC 308 006467
	Nancy Creek Updated Peak Flow Condition_01172017.pdf	11/3/2017		DC 308 006435
7	RE: Repetitive sewage spills in Decatur	11/3/2017		DC 308 006409
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	DWM_85percentDWFCap.pdf	9/20/2017		
8	DWM_1yr24hr_ModelResults.pdf	9/20/2017		
8	DWM_MMADF_ModelResults.pdf	9/20/2017		
8	Nancy Creek Capacity Request_Completed Update Model Run_01062017 (2).pdf	10/17/2017		
8	Model Capacity Evaluation for SSO locations_07272016.pdf	10/17/2017		
8	Snapfinger Capacity Request Model Run Results_02012017.pdf	10/17/2017		
8	5597 Buford Highway Capacity Analysis Report.pdf			
8	Tucker Township and Southfork Peachtree Interceptor Survey Request.pdf	10/17/2017		
8	Snapfinger Capacity Request Model Run Results_02082017.pdf	10/17/2017		
8	Potential Large I&I from Flow Monitoring data.pdf	10/17/2017		
8	Snapfinger Basin Completed Capacity Model Run_02082017.pdf	10/17/2017		
8	Northfork Peachtree Completed Capacity Model Run_02082017 (1).pdf	10/17/2017		
8	Skyland Trail Young Adult Campus_Capacity analysis.pdf	10/17/2017		
	Northfork Peachtree Completed Capacity Model Run_02082017.pdf	10/17/2017		
	NFPC_Capacity Request Model Rerun Results_12122016.pdf	10/17/2017		
	NFPC Capacity Request Model Rerun Results_01252017.pdf	10/17/2017		
	Northfork Capacity Request Model Run Results_02012017.pdf	10/17/2017		
	Nancy Creek Updated Model Run Results_01242017.pdf	10/17/2017		
	Nancy Creek Updated Peak Flow Condition_01172017.pdf	10/17/2017		
	Nancy Creek Capacity Request_Completed Update Model Run_12162016.pdf	10/17/2017		
8	Nancy Creek Capacity Request_Completed Update Model Run_01122017.pdf	10/17/2017		
8	Nancy Creek Completed Capacity Model Run_02082017 pdf	10/17/2017		
	Nancy Creek Capacity Request_Completed Update Model Run_01062017.pdf	10/17/2017	7 (200	
8	Decatur & Scott Blvd Dry and Wet Weather Presentation_09282016.pdf	10/17/2017		
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	ulton High St. Flow to DeKalb Capacity Evaluation.pdf	10/17/2017		
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	E: Areas that need to be studied for capacity	11/3/2017	D	C 308 006478
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		11/3/2017		C 308 006509
	specity check for Two Sewer lines receiving flow from Fulton County	11/3/2017		308 006513
	ulton High St. Flow to DeKatb Capacity Evaluation.pdf	11/3/2017		308 006514

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8	Oresden Area Capacity Evaluation_08172016.pptx	11/3/2017		DC 908 006501
8	Question 8 Date by when we can have the map (2).pdf	11/3/2017		DC 308 006487
8	Questions 5 and 6 capacity dresden.pdf	11/3/2017		DC 308 006485
8	Question 8 Sewer Capacity Map.pdf	11/3/2017		DC 308 006483
8	Questions 5 6 and 8 survey 3350 and 5251 - Copy.pdf	11/3/2017		DC 308 006484
8	Questions 5 6 and 8 capacity assurance project.pdf			DC 308 006471
8	Questions 5 6 and 8 emergency survey.pdf	11/3/2017		DC 308 006469
8	Questions 5 6 and 8 flow monitor 1989 dering.pdf	11/3/2017		DC 308 006470
8	Questions 5 6 and 8 nfork42.pdf	11/3/2017		DC 308 006472
8	Questions 5 6 and 8 survey chambles.pdf	11/3/2017		DC 308 006476
8	Questions 5 6 and 8 emergency flow monitor carver cir.pdf	11/3/2017		DC 308 006475
8	Questions 5 6 and 8 survey larence/ille.pdf	11/3/2017		DC 308 006477
8	Questions 5 6 and 8 emergency flow monitor, pdf	11/3/2017		DC 308 006473
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10	Final Model Technical Review TM 03282017.pdf	化 信息 经正常股份 由此等	1	
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11	Dekalb Modeling 6-21-2016 DWM model workshop_final.pdf		7	
11	09 14 17 PASARP Capacity Analysis Protocols.pdf	9/20/2017		
11	Model Assumptions Summary.pdf	9/20/2017		
11	DeKalb County New Connection Flows Recommended Anomaria Access to the	9/20/2017		
11	2016 ndf CDPMT Response_Final.pdf	9/20/2017		
11	303 Latter_ModelAssump_Summary-Item 11.pdf	10/9/2017		
11	5 12 2017 Meeting Presentation.pdf	10/9/2017		
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12	Enclosure 12.pdf		4	
	3. 201712015napfingerBasinHydraulicModelAppficationReportDraftV2.pdf	9/20/2017		
12	1. 20171201PBbasinHydraulicModelApplicationReportDraftV2.pdf	12/5/2017		
12	2. 20171201IntGovBasinHydraulicModelApplicationReportDraftV2.pdf	12/5/2017		
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13	Sewer Allotted Flows as of 09-18-17.pdf		398	
	Copy of Sewer Capacity RECORDS from 2013 to 2016 9 30 16.pdf	9/20/2017		The Constitutes and Constitution (Constitution Constitution)
	1036 Devine Circle SFR	9/20/2017		
	1057 North Jamestown Road Parkside at Mason Mills	9/20/2017		
11000	116 Northern Av.	9/20/2017		
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	1181 Hammond Drive HE One Life Fitness	9/20/2017		
13	189 Oldfield Rd.	9/20/2017		



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13	1197 Oldfield Rd.	9/20/2017	The second secon	Bates Number (If necessary to find in Workshare
13	1205 Oldfield Rd.	9/20/2017		
13	1257 University Drive SFR	9/20/2017		
13	1295 Hopkins Terrace	9/20/2017		
13	1316 Thomas Road	9/20/2017		
13	1338 N. Cliff Valley Way FULL Cap Approval			
13	137 Buttrick Drive-Rebekah Hall Renovation Agnes Hall	9/20/2017		
13	1375 Fenway Circle SFR	9/20/2017		
13	1419-1431 Bouldercrest Approval letter 9-14-17	9/20/2017		
13	1455 Montreal Road EUOSH O R Expansion	9/20/2017		
13	148 Meadiris Drive SAP	9/20/2017		
13	1507 Brianwood Road	9/20/2017		
13	152 Meadiris Drive SAP	9/20/2017		
13	1530 & 1536 Dunwoody Village Parkway- Dunwoody Village THs 2	9/20/2017		
13	1530 Dunwoody Village Pkwy Capacity Revised	9/20/2017		
13	1531 Deerwood Drive SFR	9/20/2017		
13	156 Meadirls Drive SAP	9/20/2017		
13	160 Meadin's Drive SAP	9/20/2017		
13	1600 Dunwoody Club Drive North Wing Erpansion	9/20/2017		
13	1669 H Decatur Rd - Approved SAP	9/20/2017		
13	1764 North Akin Drive SFR Septic to Sewer	9/20/2017		
13	1774 Vickers Circle SAP	9/20/2017		W R Sur Vestilla Control of Contr
13	1836 Briarcliff Road NE Quiktrip 745	9/20/2017		
13	184 South Candler Street Bookstore	9/20/2017		
13	1877 Ham Drive SFR	9/20/2017		
13	1918 Chamblee Tucker Rd Approval letter 9-14-17	9/20/2017		
	1923 Clairmont Road Clairmont Road Office Building	9/20/2017	5000-0	
	1949 Skyview Circle Skyland Brookhaven Apts	9/20/2017		
	1989 Dering Circle Approval letter 9-14-17	9/20/2017		
	20 Executive Park West Hawks Practice Facility	9/20/2017		
	2029 Memorial Drive Capacity	9/20/2017		
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	2030 Pernoshal Court - FULL approval letter 7-12-17 2037 Weerns Road Green Park	9/20/2017		
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	205 Sycamore Street Decatur Presbyterian Church 2	9/20/2017		
	2050 Will Ross Court	9/20/2017		
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	086 Capehart Cir SFRR	9/20/2017		-
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11	328 Marigna Avenue - Approved SAP	9/20/2017		
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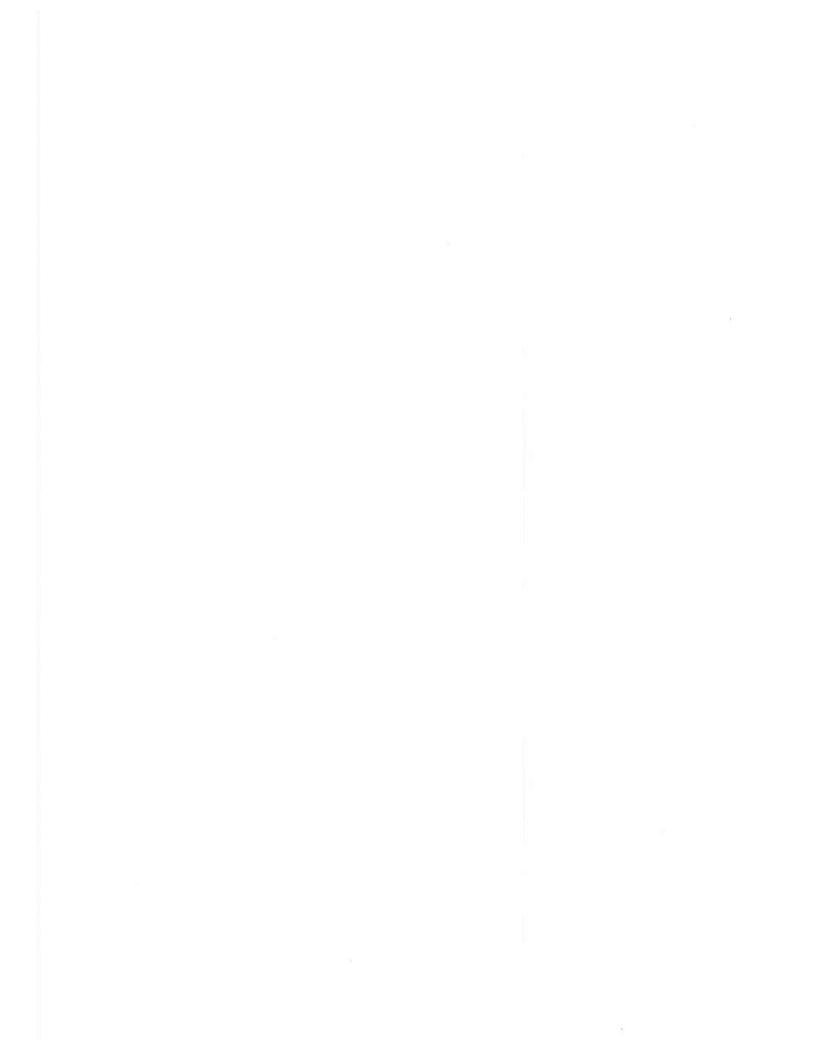
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Final Approved SAP - 2274 Northbike Center Dr	13	Final Approved SAP - 1975 Clairmont Rd	1107/07/6		
	13	Final Approved SAP - 2274 Northlate Center Dr	710/2017		

Enclosure	Document Name	Date Posted to WorkShare	Number of Documents	
13	Final Approved SAP - 254 3rd Avanue	9/20/2017	Silver of Comments	Bates Number (If necessary to find in Workshare
13	Final Approved SAP - 2579 Lawrenceville Highway	9/20/2017		
13	Final Approved SAP - 2646 Gresham Rd	9/20/2017		
13	Final Approved SAP - 2860 Parkridge Drive (2)	9/20/2017		
13	Final Approved SAP - 2860 Parkridge Drive	9/20/2017		
13	Final Approved SAP - 3521 Hamlin Drive			
13	Final Approved SAP - 3553 Brycewood Drive	9/20/2017		
13	Final Approved SAP - 4198 North Shallowford Road	9/20/2017		
13	Final Approved SAP - 5070 Peachtree Blvd. (Bidg. B-150)	9/20/2017		
13	Final Approved SAP - 5090 Peachtree Blvd. (Bidg. D)	9/20/2017		
13	Final Approved SAP - 523 Church Street	9/20/2017		
13	Gooddard School Sewer Capacity	9/20/2017		
13	Letters showing Sewer Capacity 116 Northern Ave.	9/20/2017		
13	SAP 3196 Parkridge Crescent	9/20/2017		
13	SAP 3220 Mills Creek Circle	9/20/2017		
13	SAP 4068 Comanche Dr	9/20/2017		
13	SAP 4224 Lavista Road	9/20/2017		
13	SAP 5537 Peachtree Road	9/20/2017		W2000000000000000000000000000000000000
13	Sewer Capacity Letter - 2179 Bouldercrest Rd	9/20/2017		
13	Sewer Capacity Letter - 4047 Peachtree Rd	9/20/2017		
13	1111 Hammond Drive KDC Statefarm Ph II IG	9/20/2017		
13	1179 S Hairston Road -Waffle House	9/20/2017		
13	1189 Houston Mil Road Houston Estates	9/20/2017		
13	120 W Trinity revised SAP conditional capacity approval letter 6-12-17	9/20/2017		
13	1253 Church Street Townhomes Appvd SAP	9/20/2017		
13	1296 Moreland Avenue- Walfle House	9/20/2017		
13	1336 Dresden Dr	9/20/2017		
13	1405 Clifton Rd CHOA Trailer Approved SAP	9/20/2017		
13	1430 Tullie Road-CHOA Medical Office Bldg-Conditional Sewr Capacity APPROVED	9/20/2017		
13	1450 South Deshon Road Harvest Tabernacle Church	9/20/2017		
13	1530 IdlewoodRd_Approved	9/20/2017		
13	1551 Briarcliff Road Briarcliff Flats & This SFPC Basin	9/20/2017		
	1551 Briarcliff Road Fox 2 Flats and Condos	9/20/2017		
1000	1601 AshbrookeTrace_Approved	9/20/2017		
0.000	1727 Mountain Industrial Bird Hardees	9/20/2017		
	1840 McJenkin Drive Peachtree Creek Township	9/20/2017		
		9/20/2017		
	1889 Lawrenceville Highway Towns at North Decatur IG 1911 Wyndale Ct. SAP	9/20/2017		
		9/20/2017		
	1966 Braeburn Circle Enclave at Sylvester Circle appr SAP	9/20/2017		

Enclosure	Document Name	Date Posted to WorkShare	Number of Documents	Bates Number (If necessary to find in Workshare
13	2171 Lavista Rd Approved Sewer Action Plan	9/20/2017		A Marian Company of the M. Workshare
13	2180 2200 Northlake Pkwy - Approved SAP	9/20/2017		
13	2201 CiscoAvenue_Approved	9/20/2017		
13	2215 Perimeter Park Dr. SAPvO	9/20/2017		
13	2390 Chamblee Tucker Road Magnum Plaza	9/20/2017		
13	240 North Acadia Avenue Snapfinger Basin letter	9/20/2017		
13	2505 Brannen Rd	9/20/2017		
13	2586 Osborne Road Apple Valley at East Osborne Road NFPC Basin	9/20/2017		
13	2591 Whites Mill Road Swift Creek	9/20/2017		
13	2592 Blackmon Dr_Approved	9/20/2017		
13	260 N. Arcadia Avenue Townsend at Decatur IG	9/20/2017		
13	2641 EastCollege Avenue Avondale TOD Phases I IB & II (2)	9/20/2017		
13	2641 EastCollege Avenue Avondale TOD Phases I IB & II			
13	2677-2711 Lawrenceville Hwy-Appvd SAP UPdate	9/20/2017		
13	2700 E College Avenue Sams Crossing 05 16 17	9/20/2017		
13	2964 Briancliff Rid INE SAPVO	9/20/2017		
13	2972 Hermance Drive Hermance Townhomes	9/20/2017		
13	3000 Flowers Rd South GSA Atlanta Field Office NFPC Basin	9/20/2017		
13	3193 Briancliff Road Carramore IG	9/20/2017		
13	3194 Corsair Drive Walfle House Hangar Development NFPC Basin	9/20/2017		
13	3211 N. Druid Hills & 1114-1122 Blackshear Drive The Fields at Druid Hills - 2	9/20/2017		
13	3257 Mills Creek Circle Grantland IG	9/20/2017		
13	3274 Northlake Parkway Tru Hotel Northfork Basin	9/20/2017		
13	3350 Chamblee Dunwoody Road Peachtree Townpark Intergovernmental	9/20/2017		
	3431 3435 Lawrenceville Highway Dilworth Gates at LaVista	9/20/2017		
	3523 Buford Hwy-Sewer Cap Req & SAP	9/20/2017		
	3534 Clarkston Industrial Blvd - Starnes Senior Living Ctr Approved SAP	9/20/2017		
13	3549 Blair Circle Conditional Approval Letter 9-14-17	9/20/2017		
13	3693 Clairmont Road The Space Shop-Bragg St NFPC Basin	9/20/2017		
	3717 Spring Street SFR	9/20/2017		
	3757 Chamblee Dunwoody Road Townsend at Chamblee NC Basin	9/20/2017		
	4271 Carver Circle Signed Cond Approval	9/20/2017		
A STATE OF THE PARTY OF THE PAR	4401 Chamblee Dunwoody Road Candlewood Holiday Inn Nancy Creek Basin	9/20/2017		
	445 Halwick Way Rockbridge Elementary School	9/20/2017		
1000 E 1000	4511 Hugh Howell Road Pure Vida Laundry Service	9/20/2017		
	4536 Chamblee Dunwoody Road Dunwoody Township	9/20/2017		
	4544 Covington Hwy Alden Park	9/20/2017		
	4650 Hugh Howe I Road Tucker McCauley IG	9/20/2017		
	48.35 Kings Down Road SFR	9/20/2017		
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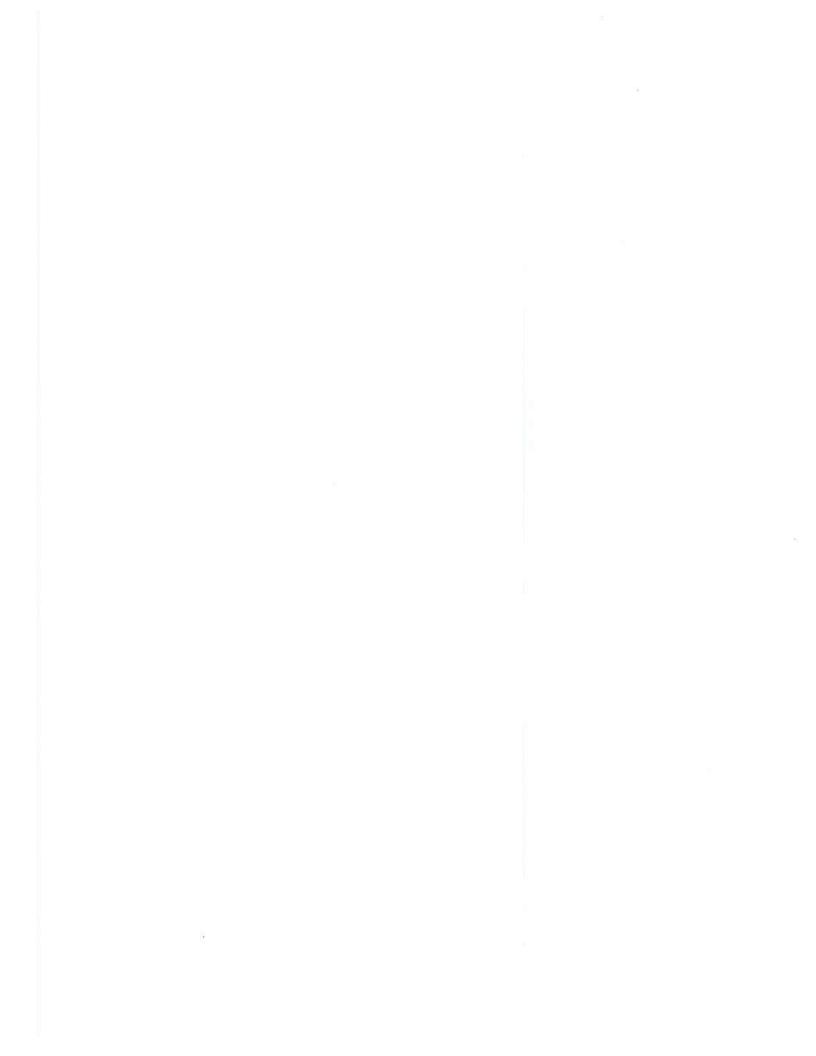
Enclosure	Document Name	Date Posted to WorkShare	Service - Marrie of Charleson and	mor market and an arrangement of the second
13	Laredo Drive Perry - Avila at Avondale Estates		Humber of Documents	Bates Number (if necessary to find in Workshare
13	SAP 216S North Decatur Rd	9/20/2017		AND
13	SAP 260S Chamblee Tucker rd	9/20/2017		
13	The Hollbrook at Decatur 2016-12-23 Appvd SAP	9/20/2017		
13	The Assembly_Approved SAP	9/20/2017		
13	Sites along East College Ave.pdf	9/20/2017		
13	MARTA TOD Letter Showing Sewer Capacity.pdf	10/18/2017		
13	2179 Bouldcrest rd.pdf	10/18/2017		
13	3635 Briarcliff Road capacity report from 4-24-16.pdf	10/18/2017		(1992) - 1994 (1994) - 1994 (1994) - 1994 (1994) 1994 - 1994
13	1111 Hammond - KDC_Statefarm Approval letter 6152017.pdf	10/18/2017		
13	2017 Jan 30 Inaccurrate Sewer Capacity Approval Ltr to EPA.pdf	10/18/2017		
13	2017 Jan 30 Inaccurrate Sewer Capacity Approval Ltr to EPD - Copy.pdf	10/18/2017		
13	1743 Flat Shoals Approval Latter 9-20-15.pdf	10/18/2017		
13	Haynes Park Approval Letter 9-14-17.pdf	10/30/2017		DC 308 05952
13	4041 Clairmont Rd Packet.pdf	10/30/2017		DC 308 05889
13	3200 Northcrest Way Approval Letter 9-26-17.pdf	10/30/2017		DC 308 06214
13	8425 Mall Pkwy Packet.pdf	10/30/2017		DC 308 06169
13	1754-1762 N Druid Hills Packet.pdf	10/30/2017		DC 308 06205
13	6092 Covington Hwy Approval Letter 10-13-17.pdf	10/30/2017		DC 308 06184
13	4143 Ashford Dunwoody Rd Packet.pdf	10/30/2017	1 1 1 1 1 1 1 1 -	DC 308 06174
13	108 Forkner Dr Packet, pdf	10/30/2017		DC 308 06190
13	3575 Durden Rd Ste 305 Packet.pdf	10/30/2017		DC 308 06202
13	2084 Plantation In Approval Letter 10-13-17.pdf	10/30/2017		OC 308 06196
13	5070 Peachtree Blvd Ste A130 Packet.pdf	10/30/2017		OC 308 06129
13	6035 Peachtree Rd Ste A104-105 Packet.pdf	10/30/2017		OC 308 06159
13	7693 Haynes Park Place Packet.pdf	10/30/2017		C 308 06118
13	3549 Blair Circle Conditional Approval Letter 9-14-17.pdf	10/30/2017	c	C 308 06162
	5076 Covington Hwy Approval letter 9-14-17.pdf	10/30/2017		C 308 06158
7	5134 Peachtree Rd Packet.pdf	10/30/2017	0	C 308 06157
4/2/20	5124 Peachtree Rd Approval letter 9-14-17.pdf	10/30/2017	0	C 308 06147
	2536 Melville Ave Approval Letter Packet 9-22-17.pdf	10/30/2017	D	C 308 06155
	5134 Peachtree Rd Approval letter 9-14-17 pdf	10/30/2017	D	C 308 06140
	5070 Peachtree Ind Blvd Ste B140.pdf	10/30/2017		C 308 06156
		10/30/2017		C 308 06041
	3000 Flowers Rd South Approval Letter 9-29-17.pdf	10/30/2017		2 308 06042
	196 Magnolia Dr Approval Letter 9-26-17.pdf	10/30/2017		308 06048
72	1835 Kent Ave Approval Letter 9-15-17.pdf	10/30/2017		308 06053
	175 Mead Rd Approval Letter 10617.pdf	10/30/2017		
	167 Wynterhall Ln Approval Letter 9-14-17.pdf	10/30/2017		308 06064
13 5	05 Kilgo Rd Approval Latter 09-14-17.pdf	10/30/2017	00	308 06068



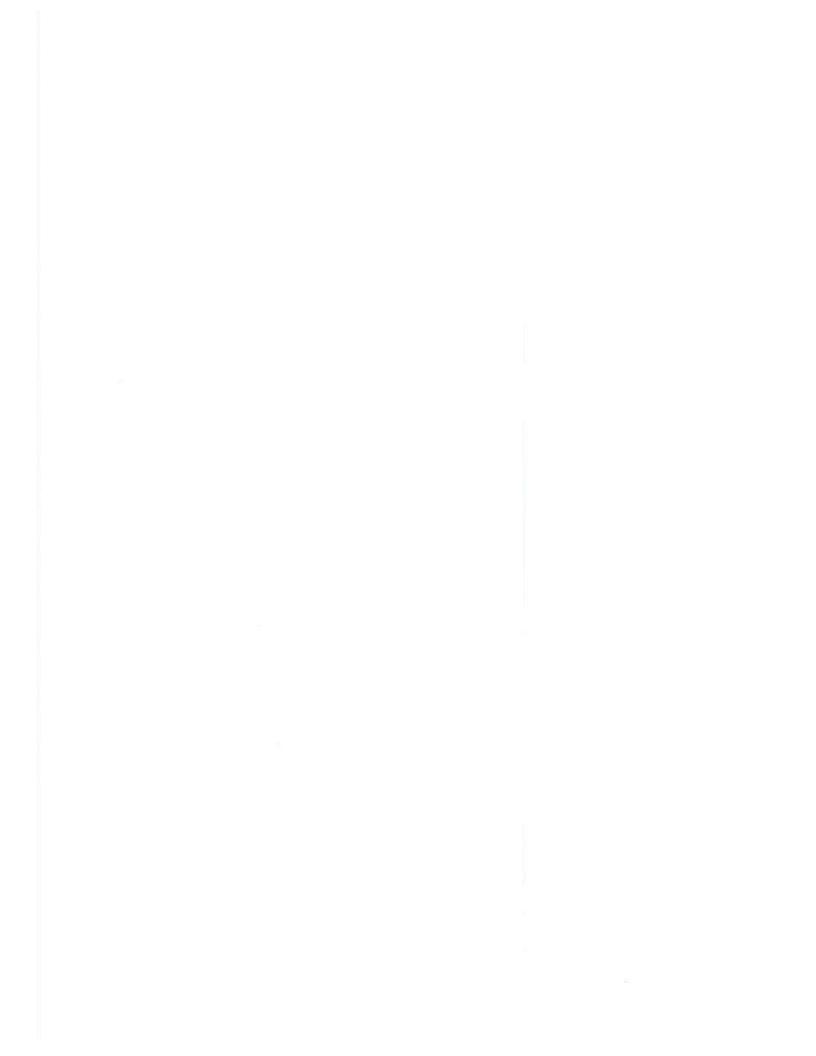
Enclosure	Document Name	Date Posted to WorkShare.	Number of Documents	Bates Number (If necessary to find in Workshare
13	3S49 Blair Circle Packet.pdf	10/30/2017	and the same of th	DC 308 06070
13	Parks at Stonecrest Approval Letter 9-27-17.pdf	10/30/2017		DC 308 06090
13	1419-1431 Bouldercrest Packet.pdf	10/30/2017		DC 308 06101
13	1320 Hearst Dr Packet.pdf	10/30/2017		DC 308 06108
13	3526 Donaldson Dr Approval Letter 9-14-17.pdf	10/30/2017		DC 308 06113
13	510 Avery St Approval Letter 10617.pdf	10/30/2017		DC 308 05114
13	3564 Ashford Dunwoody Rd Packet.pdf	10/30/2017		
13	1918 Chamblee Tucker Rd Approval letter 9-14-17.pdf	10/30/2017		DC 308 06031
13	Heritage Estates Approval Letter 9-28-17.pdf	10/30/2017		DC 308 06040
13	4840 Flat Shoals Pkwy Packet.pdf	10/30/2017		DC 308 06015
13	4960 Covington Hwy Approval Letter 10-2-17.pdf	10/30/2017		DC 308 05006
13	1918 Chamblee Tucker Rd Packet.pdf	10/30/2017	-	DC 308 06151
13	Miller Park Approval Letter 9-27-17.pdf	10/30/2017		DC 308 05021
13	101 Fifth Ave Approval Letter 10617.pdf	10/30/2017		DC 308 06000
13	2610 North Druid Hills Approval Letter 9-28-17.pdf	10/30/2017		DC 308 05527
13	5547 Peachtree Blvd Approval Letter 9-15-17.pdf	10/30/2017		DC 308 05531
13	1527 Runnymeade Dr Approval Letter 9-29-17.pdf	10/30/2017		DC 308 05540
13	1466 Clairmont Rd Partial Approval Letter 9-22-17.pdf	10/30/2017		DC 308 05549
13	3431-3435 Lawrenceville Hwy Approval Letter 10-11-17.pdf	10/30/2017		DC 308 05563
13	724 Rock Chapel Rd Approval Letter 9-14-17.pdf	10/30/2017		DC 308 05568
13	1260 Briarcliff Rd Approval letter 9-14-17.pdf	10/30/2017		DC 308 05574
13	5070 Peachtree Blvd Ste B140 Packet.pdf	10/30/2017		DC 308 05575
13	4143 Ashford Dunwoody Rd Approval letter 9-14-17.pdf	10/30/2017		DC 308 05576
13	2974 Catalina Dr Approval Letter Packet 9-21-17.pdf	10/30/2017		DC 308 05579
13	5070 Peachtree Ind Blvd Ste A130.pdf	10/30/2017		DC 308 05580
13	4840 Flat Shoals Plwy Approval letter 9-14-17.pdf	10/30/2017		DC 308 05583
13	1880 Lawrenceville Hwy Approval Letter 10-4-17.pdf	10/30/2017		DC 308 05584
13	5124 Peachtree Rd Packet.pdf	10/30/2017		OC 308 05585
13	5177 Buford Hwy Ste A Approval Letter 10-9-17.pdf	10/30/2017		OC 308 05592
	3524 Keswick Dr Packet.pdf	10/30/2017		OC 308 05595
13	5001 Peachtree Bhd Approval Letter 10-2-17 pdf			OC 308 05598
13	1405 Clifton Rd Approval Letter 10-13-17.pdf	10/30/2017		OC 308 05604
13	4088 Oak Forest Dr Packet.pdf			OC 308 05608
13	5251 Peachtree Ind Blvd Approval Letter 9-29-17.pdf	10/30/2017		C 308 05619
	2964 Briarcliff Rd NE Approval Letter 10-2-17.pdf	10/30/2017		C 308 05626
	1419-1431 Bouldercrest Approval letter 9-14-17 pdf	10/30/2017	0	C 308 05635
	5577 Peachtree Blvd Approval Latter Packet 9-22-17-pdf	10/30/2017	0	C 308 05638
22.0	1840 McJenkin Dr Approval Letter 9-22-17.pdf	10/30/2017		C 308 05639
	3194 Corsair Dr Approval Letter 9-29-17.pdf	10/30/2017	D	C 308 05649
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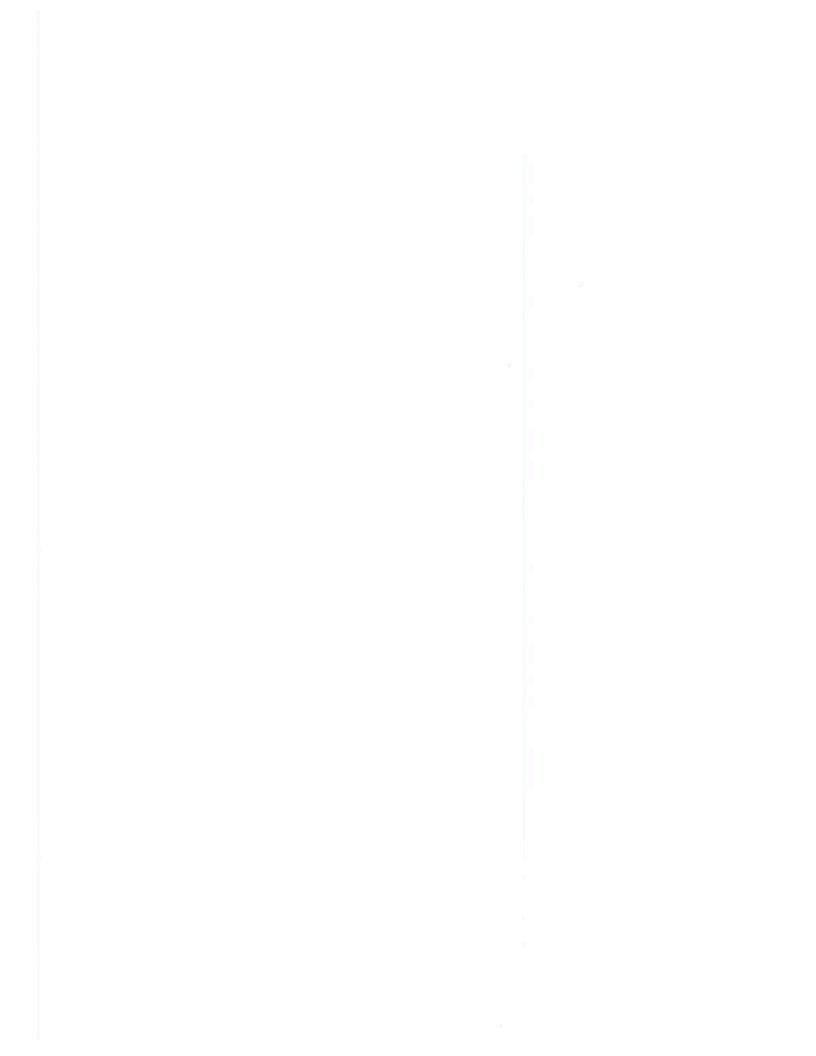
Enclosure	Document Name	Date Posted to WorkShare	Mumber of Documents	Bates Number (If necessary to find in Workshere
13	2830 Dresden Dr Approval Letter 9-28-17.pdf	10/30/2017	Control of the State of the Sta	DC 308 05662
13	3564 Ashford Dunwoody Rd Approval letter 9-14-17.pdf	10/30/2017		DC 308 05671
13	2972 Hermance Dr Approval Letter 10917.pdf	10/30/2017		
13	8425 Mail Pkwy Approval Letter 9-14-17.pdf	10/30/2017		DC 308 05672
13	2137 Oak Knob Dr Approval Letter -20-17.pdf	10/30/2017		DC 308 05676
13	3524 Keswick Dr Approval letter 9-14-17.pdf	10/30/2017		DC 308 05677
13	4761 Peachtree Rd Approval Letter 10917.pdf	10/30/2017		DC 308 05680
13	5781 Buford Hwy Ste 101 Approval Letter 10917.pdf	10/30/2017		DC 308 05681
13	2617 Panola Rd Approval Letter 10-5-17.pdf	10/30/2017		DC 308 05687
13	4166 Buford Hwy Ste 1112 Approval letter 9-14-17.pdf	10/30/2017		DC 308 05690
13	1466 Clairmont Rd Partial Approval Letter Packet 9-22-17.pdf	10/30/2017		DC 308 05699
13	5070 Peachtree Bhd Ste B140 Approval Letter Packet 9-20-17.pdf	10/30/2017		DC 308 05700
13	1702 Bouldercrest Rd Approval Letter 9-14-17.pdf	10/30/2017		DC 308 05717
13	2190 Wallingford Dr Approval Letter 9-28-17.pdf	10/30/2017		DC 308 05722
13	1989 Dering Circle Packet.pdf	10/30/2017		DC 308 05723
13	5588 Chamblee Dunwoody Approval Letter 9-20-17.pdf	10/30/2017		DC 308 05729
13	6035 Peachtree Rd Ste A106 Packet.pdf	10/30/2017		DC 308 05734
13	6768 Brownsmill Rd Approval letter 9-14-17.pdf	10/30/2017	-	DC 308 05737
13	4380 E Ponce De Leon Ave Packet.pdf	10/30/2017		DC 308 05750
13	1538 N. Amanda Circle-SFR Full Approval 9-14-17.pdf	10/30/2017		DC 308 05751
13	108 Forkner Dr Approval letter 9-14-17.pdf	10/30/2017		DC 308 05759
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13	4871 Windwood Dr Packet.pdf	10/30/2017		DC 308 05775
13	1279 Dresden Dr Packet.pdf	10/30/2017		DC 308 05776
13	5527 Chamblee Dunwoody Rd Approval Letter 10-13-17 pdf	10/30/2017		DC 308 05781
13	4088 Oak Forest Dr Approval Letter 9-14-17 pdf	10/30/2017		DC 308 05785
13	5227 Meadowcreek Dr Approval Letter 9-26-17 pdf			XX 308 05790
13	1260 Briarcliff Rd Packet.pdf	10/30/2017		C 508 05791
13	1320 Hearst Dr NE Approval letter 9-14-17-pdf	10/30/2017		X 308 05796
13	6076 Covington Hwy Packet pdf	10/30/2017		XC 308 05800
13	603S Peachtree Rd Ste 114 Packet.pdf	10/30/2017		C 308 05801
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	6035 Peachtree rd Ste A106 Approval letter 9-14-17 pdf	10/30/2017	0	C 308 05820
	5070 Peachtree Blvd Ste B120 Packet.pdf	10/30/2017	D	C 308 05827
	6768 Brownsmill Rd Packet.pdf	10/30/2017	D	C 308 05828
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13	5070 Peachtree Ind Blvd Ste 8120.pdf	10/30/2017	DC 308 05857
13	6035 Peachtree rd Ste 114 Approval letter 9-14-17.pdf	10/30/2017	DC 308 05858
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13	3526 Donaldson Dr Packet.pdf	10/30/2017	DC 308 05864
13	4871 Windwood Dr Approval letter 9-14-17.pdf	10/30/2017	DC 308 05870
13	4900 Longview Walk Cond. Approval Letter 9-14-17.pdf	10/30/2017	DC 308 05871
13	1324 Telford Dr Approval Letter 9-29-17.pdf	10/30/2017	DC 308 05885
13	2029 Memorial Dr Packet.pdf	10/30/2017	DC 308 05995
13	3360 Mountain Dr Approval Letter 9-14-17.pdf	10/30/2017	DC 308 05891
13	3625 Briarcliff Rd Approval Letter 9-28-17.pdf	10/30/2017	DC 308 05892
13	5382 Buford Hwy Approval Letter 9-15-17 pdf	10/30/2017	DC 308 05905
13	6035 Peachtree rd Ste A104-105.pdf	10/30/2017	DC 308 05908
13	1551 Briancliff rd Cond. Approval Letter 9-14-17.pdf	10/30/2017	DC 308 05909
13	2029 Memorial Dr Approval letter 9-14-17.pdf	10/30/2017	
13	724 Rock Chapel Rd Packet.pdf	10/30/2017	DC 308 05937 DC 308 05938
13	1989 Dering Circle Approval letter 9-14-17.pdf	10/30/2017	DC 308 05999
13	5577 Peachtree Blvd Approval Letter 9-22-17.pdf	10/30/2017	
13	3575 Durden Rd Ste 305 Approval letter 9-14-17 pdf	10/30/2017	DC 308 05956
13	6035 Peachtree Rd Ste C201202 Packet.pdf	10/30/2017	DC 308 05966
13	4166 Buford Hwy Ste 1112 Packet.pdf	10/30/2017	DC 308 05967
13	1678 Koppers Rd Approval Letter 10-13-17.pdf	10/30/2017	DC 308 05970
13	4453 Ashford Dunwoody Rd Approval Letter 09-14-17 pdf	10/30/2017	DC 308 05975
13	4041 Clairmont rd Approval Letter 9-14-17.pdf	10/30/2017	OC 308 05980
13	5713 Sawgrass Circle Approval Letter 9-28-17 pdf	10/30/2017	DC 308 05981
13	1415 Constitution Rd Approval Letter 10-13-17.pdf	10/30/2017	DC 308 05982
13	5251 Peachtree Industrial Blvd 5 5 2016 pdf	11/3/2017	DC 308 05989
13	DOC062816-06282016102805.pdf	11/3/2017	DC 308 006542
13	2198 Dresden Road Capacity pdf	11/3/2017	DC 308 006545
13	Ashford Dunwoody Sewer Issue	11/3/2017	DC 308 006566
13	3423 3431 3435 Lawrenceville Hwy.pdf	11/3/2017	DC 308 006533
13	1975 Clairmont Road Avail.pdf	11/3/2017	DC 308 006563
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13	3960 Redan Road pdf	11/3/2017	DC 308 006536
13	1888 Catillion Drive Cap.pdf	11/3/2017	DC 308 006554
13	1530 Dunwoody Village Pkwy Cap.pdf	11/3/2017	DC 308 006548
13	3904 Durham Park Road Avail Updated.pdf	11/3/2017	OC 308 006551



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15	CD LS Project Variations Memo_053017CM_GH.pdf	9/20/2017	
15	DDR Rev 2 Feb 2013 Final pdf		
15	Stonecrest Flow TM_Draft_020116_Rev 1.pdf	9/20/2017	
15	Stephenson Creek Flow TM_Draft_032816.pdf	9/20/2017	
15	Design Development Report-Johnson Creek Pump Station.pdf	9/20/2017	
15		9/20/2017	
15	Design Development Report-Honey Creek Pump Station, Force Main.pdf	9/20/2017	
15	EPD Lift Station Improvements CMM.pdf	9/20/2017	
	EPO Lift Station Improvements CMM3.pdf	9/20/2017	
15	Prioritized Lift Station CIP.pdf	9/20/2017	
15	DeKalb County Interim Capacity Standard Operating Procedure 8.15.17.pdf	12/5/2017	
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16	Item16_06282017_toEPA.pdf	9/20/2017	



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# Elliott, Richard

From:

Veira, E. Fitzgerald <fitzgerald.veira@troutmansanders.com>

Sent:

Tuesday, January 16, 2018 5:31 PM

To:

Bush, William

Cc:

Zapata, Cesar; Welch, Matthew C.; Ghosh, Mita; Stephenson, Natalie; Horsey, Maurice;

Elliott, Richard; Bill Weinischke; Suzanne Success Osborne; Williams, Laura; Houser,

Maria V.

Subject:

RE: Dekalb

Bill, the draft CAP and Consent Decree modification letter are going through internal review. As our draft CAP builds on the interim capacity certification protocol, the comments we received from EPA/EPD on the certification protocol are being reviewed in terms of their implications for the CAP and the interim certification process itself. We are also in the process of briefing the County management on the comments.

It will likely take a few more days to fully vet the Consent Decree modification letter and get the input we need from our consultants on the EPA/EPD comments. We hope to get that letter out by the end of this week. Also, based on everyone's schedule, we propose to have a follow-up discussion with EPA and EPD regarding the comments next week Wednesday or Thursday (instead of this week). The County wants to address EPA/EPD's comments on the interim protocol before we submit/complete the draft CAP. We will follow-up with you and/or Richard later this week. Thanks.

# E. Fitzgerald Veira

troutman sanders
Direct: 404.885.3278
fitzgerald.veira@troutman.com

From: Bush, William [mailto:Bush.William@epa.gov]

Sent: Tuesday, January 16, 2018 2:56 PM

To: Veira, E. Fitzgerald <fitzgerald.veira@troutmansanders.com>

Cc: Zapata, Cesar < Zapata. Cesar@epa.gov>; Welch, Matthew C. < macwelch@dekalbcountyga.gov>; Ghosh, Mita

<Ghosh.Mita@epa.gov>; Stephenson, Natalie <stephenson.natalie@epa.gov>; Horsey, Maurice

<Horsey.Maurice@epa.gov>; Elliott, Richard <Elliott.Richard@epa.gov>; Bill Weinischke <bill.weinischke@usdoj.gov>;

Suzanne Success Osborne <sosborne@law.ga.gov>; Williams, Laura <laura.williams@dnr.ga.gov>; Houser, Maria V.

<Maria.Houser@troutmansanders.com>; Bush, William <Bush.William@epa.gov>

Subject: RE: Dekalb

Hi, Fitzgerald. Just checking in with you to see if the County submitted the information set forth in items 1 and 2 below. If so, can you let us know when and to whom. If not, when might we expect to get it? Thanks.

From: Veira, E. Fitzgerald [mailto:fitzgerald.veira@troutmansanders.com]

Sent: Friday, December 15, 2017 5:14 PM To: Ghosh, Mita < Ghosh. Mita@epa.gov>

Cc: Zapata, Cesar < Zapata.Cesar@epa.gov >; Bush, William < Bush.William@epa.gov >; Welch, Matthew C.

<macwelch@dekalbcountyga.gov>

Subject: RE: Dekalb

Mita, in response to your email below, on behalf of DeKalb County, I am confirming that all sanitary sewer hookups to the County's sewer system will be certified by a licensed Georgia professional engineer beginning December 20, 2017, as Mr. Thurmond assured EPA and EPD during the meeting. With respect to the Country's specific ask of the Administrator, the County seeks EPA's cooperation on the following:

Development of a capacity assurance program ("CAP") suitable for the County. The County expects
that program will be in place at least until the County has developed a wet weather dynamic model or
potentially for the duration of the Consent Decree period. We expect to have a draft of that CAP ready
for presentation to EPA by January 15, 2018, and would appreciate EPA's prompt attention to the CAP,
and an expedited negotiation of a final CAP.

 Modification of the Consent Decree. The County will provide justification for modification of the Consent Decree in writing no later than January 15, 2018, and would appreciate EPA's support in achieving an amended Consent Decree to allow the CAP, among other potential modifications.

3. As noted, the County will be certifying capacity beginning December 20<sup>th</sup>. While EPA's approval of the County's program for certifying capacity is not required, in the interest of full cooperation, the County plans to provide to EPA on Monday December 18<sup>th</sup> a copy of its capacity certification program document. The County would appreciate any feedback from EPA regarding significant concerns, if any, EPA may have regarding its program.

Thanks,

# E. Fitzgerald Veira

troutman sanders Direct: 404.885.3278

fitzgerald.veira@troutman.com

From: Ghosh, Mita [mailto:Ghosh.Mita@epa.gov]
Sent: Thursday, December 14, 2017 3:37 PM

To: Veira, E. Fitzgerald < fitzgerald.veira@troutmansanders.com>

Cc: Zapata, Cesar < Zapata. Cesar @epa.gov >; Bush, William < Bush. William @epa.gov >

Subject: RE: Dekalb

### Fitzgerald:

We still have not received anything from you all in writing about your ask from the Regional Administrator. When do you expect to have the written request to EPA? Also, during the meeting Mr. Thurmond assured us that after December 20th all hookups would be certified by a PE. Can you please confirm that is still the intent of the County. Thanks

mita

Mita Ghosh Chief, Office of Water Legal Support Office of Regional Counel United States Environmental Protection Region 4 404-562-9568

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From: Veira, E. Fitzgerald [mailto:fitzgerald.veira@troutmansanders.com]

Sent: Thursday, December 7, 2017 1:06 PM To: Ghosh, Mita < Ghosh. Mita@epa.gov>

Cc: Houser, Maria V. < Maria. Houser@troutmansanders.com >; gfleming@vnf.com; Zapata, Cesar

< Zapata.Cesar@epa.gov >; Bush, William < Bush.William@epa.gov >; Matthew C. Welch

<macwelch@dekalbcountyga.gov>

Subject: Re: Dekalb

Thanks, Mita. We certainly will. We also think it would sense to tentatively hold December 19th (preferably afternoon) for a follow up meeting with EPA/EPD.

# E. Fitzgerald Veira

troutman sanders Direct: 404.885.3278

fitzgerald.veira@troutman.com

On Dec 4, 2017, at 10:18 AM, Ghosh, Mita < Ghosh. Mita@epa.gov > wrote:

### Good Morning:

I just wanted to make sure that you all were in the process of putting any and all requests you have from EPA in writing. It is important that we have your request in writing and more importantly the reason for you request so that we can explain to the Judge and DOJ the what and why of what you all are seeking moving forward. Please call me if you have any questions. Thanks

Mita

Mita Ghosh Chief, Office of Water Legal Support Office of Regional Counel United States Environmental Protection Region 4 404-562-9568

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# Elliott, Richard

From: Rhinehart, William E. (Ted) <werhinehart@dekalbcountyga.gov>

Sent: Friday, January 12, 2018 2:51 PM

To: Elliott, Richard

Cc: Stephenson, Natalie; Shahbazaz, Marzieh; Hays, Lewis; Horsey, Maurice; Capp, James;

Williams, Laura; Suzanne Success Osborne; Bush, William; Veira, E. Fitzgerald (Troutman

Sanders); Welch, Matthew C.; maria.houser@troutmansanders.com; Zapata, Cesar

Subject: RE: DeKalb County Interim Procedures and Capacity Evaluation

Mr. Elliott, good afternoon.

This acknowledges the receipt of your note. We will review the agencies' comments and get back with you by Tuesday regarding availability for a meeting next week.

Best regards, Ted Rhinehart, Deputy COO/Infrastructure, DeKalb County

From: Elliott, Richard [mailto:Elliott.Richard@epa.gov]

Sent: Thursday, January 11, 2018 4:01 PM

To: Rhinehart, William E. (Ted) < werhinehart@dekalbcountyga.gov>

Cc: Stephenson, Natalie <stephenson.natalie@epa.gov>; Shahbazaz, Marzieh <Marzieh.Shahbazaz@dnr.ga.gov>; Hays, Lewis <Lewis.Hays@dnr.ga.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; Capp, James <James.Capp@dnr.ga.gov>; Williams, Laura < laura.williams@dnr.ga.gov>; Suzanne Success Osborne < sosborne@law.ga.gov>; Bush, William <Bush.William@epa.gov>; Veira, E. Fitzgerald (Troutman Sanders) <fitzgerald.veira@troutmansanders.com>; Welch, Matthew C. <macwelch@dekalbcountyga.gov>; maria.houser@troutmansanders.com; Zapata, Cesar <Zapata.Cesar@epa.gov>

Subject: DeKalb County Interim Procedures and Capacity Evaluation

Ted,

As requested, EPA and EPD have reviewed the Interim Sanitary Sewer Capacity Evaluation Program and Standard Operating Procedures most recently submitted on December 18th, 2017. Both agencies share concerns that these procedures may not be consistent with the Consent Decree's capacity certification requirements for new or increased connections to the sewer system.

We have attached our comments on those documents to this email. EPA and EPD understand that there may be minor revision to these documents and will provide amended comments as needed. Because we understand that these Interim procedures are currently being implemented by the County or will be in the near future, we would like to discuss these concerns as soon as possible. Both agencies expect availability between 11 and 12:30 on January 18th and 10 to 1 and 1:30 to 5 on January 19th. Please let us know as soon as possible if the County is available to meet on these dates.

Please feel free to forward this email to anyone I may have not included. Sara Janovitz, your usual contact at EPA, will be on leave for a few months. I will be the point of contact until Sara returns. Thank you for your time and prompt attention to this matter.

Regards

Richard Elliott, P.E., PMP

**Environmental Engineer** Water Protection Division U.S. Environmental Protection Agency - Region 4 61 Forsyth Street. S.W.

Atlanta, GA 30303

404-562-8691 404-562-9729 (Fax)



# DEPARTMENT OF WATERSHED MANAGEMENT INTERIM SANITARY SEWER CAPACITY EVALUATION PROGRAM

PROGRAM NUMBER:	CD-P-001	
PROGRAM OWNER (Division/Office):	Infrastructure Acquisitions Program	
PROGRAM APPROVAL:	DCOO/Infrastructure	
PROGRAM LAST REVIEWED/UPDATED DATE:	12/15/2017	
PROGRAM REVISION NUMBER:	1	

### INTRODUCTION

DeKalb County (the "County") has a responsibility to use its best efforts to operate, maintain, and construct its sanitary sewer system in such a manner to achieve the goals of public health protection, full compliance with the Clean Water Act, the Georgia Water Quality Control Act, and the elimination of Sanitary Sewer Overflows ("SSOs"). The County is currently undertaking a combination of Capacity, Management, Operations, and Maintenance ("CMOM") programs and capital improvements under a Consent Decree to meet this responsibility. As part of this undertaking, the County is also planning for future uses of the sanitary sewer system while orchestrating improvements using certain tools such as flow monitoring, hydraulic modeling, and engineering judgment to evaluate the hydraulic performance of the system and the impact of future connections. As sewer capacity is required for new connection requests and increases in flow contributions, the County will construct the corresponding capacity where appropriate, and will determine the appropriate cost sharing between current users, future users, and developers. Not every new connection would warrant participation by the requestor of the connection in performing system upgrades.

#### 1. PURPOSE

The purpose of this Interim Sanitary Sewer Capacity Evaluation Program ("Program") is to define the acceptable level of service that will allow for additional sewer contributions from new or improved developments and to outline certain triggers whereby the County would consider requiring financial participation or alternative capacity remedies by parties requesting sewer capacity certification. This Program is to be used until the County either adopts a capacity assurance program or a fully dynamic hydraulic model is developed.

### 2. SCOPE

For consistency in the process by which capacity determinations are made, this Program shall apply to all proposed new connections or modifications to existing connections by any entity, public or private, which result in or has the potential to result in additional flow contributions to the DeKalb County wastewater collection and transmission system ("WCTS") and wastewater treatment facilities.

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#### 3. PROGRAM REQUIREMENTS

Acceptable Sewer Capacity Requests shall be certified on the County's behalf by professional engineers registered in the State of Georgia and shall be approved by a responsible individual at the County. Sound engineering judgment shall be employed in the application of the Program requirements presented below. If on a case-by-case basis the capacity analysis differs from the requirements outlined below, based on the judgment of a professional engineer, that engineer will provide supporting information when determining acceptable capacity for proposed additional flows. In such cases, the reasoning and supporting information shall be documented and shall be included in the periodic review and update of this Program.

#### 3.1. Calculation of Design Flow Rates

The calculation of the applicant's design average daily flow rates and design peak flow rates shall conform to the standard design flow rates for various contributor classes as provided by the County in Appendix B of the County's Sewer Capacity Evaluation Request form. Alternative flow contribution rates shall be considered with supporting information. Design peak flow rates shall be used by the County in the certification of capacity for both dry and wet weather conditions. All Sewer Capacity Request forms with design average daily flow rates exclusive of any offsets or allowances which exceed 500 gallons per day shall be signed and sealed by a professional engineer registered in the State of Georgia.

#### 3.2. Capacity Evaluation Based Upon the Historical SSO Record

The historical record of SSO occurrences since January 2015 has been reviewed to determine whether sufficient evidence exists to conclude that acceptable capacity is not available for the sewer system downstream of the proposed connection. A list of capacity-related SSOs has been created and shall be maintained and updated on a monthly basis based on a review of all subsequent SSO occurrences. Engineering judgment should be used to limit the inclusion of wet or dry weather SSOs that are not related to capacity. Therefore,

- Do not include SSOs attributed exclusively to maintenance issues such as FOG, debris, roots, etc. in the review:
- Do not include SSOs where subsequent system improvements have been completed to eliminate a repeat capacity related SSO occurrence;
- Do not include SSOs unless the SSOs have the potential to occur again under normal annual dry and wet weather flow conditions; and
- Do not include SSOs attributed to operational issues at lift stations or wastewater treatment facilities which have subsequently been remedied.

The County shall review the capacity-related SSO list at least quarterly to determine whether current information indicates that an SSO occurrence is no longer determined to be related to capacity as defined above. The reason for removal of an SSO from the list shall be properly documented.

Commented [A1]: The Intent of the PE certification requirement is that the certifying PE is acting on behalf of the County. He or she therefore requires full access to all information necessary to make a proper determination. Capacity certification is likely best performed by a PE internal to the county.

Commented [A2]: This is a major weak point. These exclusions raise serious concerns for EPA/EPD. All SSOs are prohibited under the CWA. These exclusions are not consistent with the CD.

Commented [A3]: See SOP comment

#### INTERIM SANITARY SEWER CAPACITY EVALUATION PROGRAM

# 3.3. Capacity Evaluation of Collection System Based Upon Hydraulic Analysis

Hydraulic analyses to support capacity evaluations shall be completed using the County's hydraulic modeling software. Each hydraulic analysis shall include the proposed design peak flow from all pending and approved sewer connection requests whose actual flow contributions have not been recorded in the latest model calibrated flow inputs. Design peak flow rate deductions for developments with properties that have discontinued discharges to the WCTS or other changes to reduce the flow contributions to the sewer system which have not been recorded in the latest model calibrated flow inputs shall be incorporated into the Sewer System Capacity Allotment tracking form used for hydraulic analyses.

Should the hydraulic analysis of dry or wet weather conditions predict insufficient capacity, the County shall assess the validity of the prediction based upon engineering judgment and a review of the historical SSO record. As a first step, verification of system asset information via field survey may take place. Temporary flow meters may be installed downstream of the development's proposed connection to help validate model results or when the County believes additional flow monitoring is needed to better determine existing conditions. The flow meters shall be installed for a period of time sufficient to provide supporting evidence for the engineering judgment employed to certify capacity. Flow monitoring data from a prior capacity request evaluation or a prior flow study may also be used to assess capacity should engineering judgment determine that the location and time period of the flow monitoring is appropriate and sufficient to certify capacity.

### 3.3.1. Dry Weather Flow Condition and Level of Service

The dry weather flow condition shall be the dry weather flow pattern developed from the most current flow monitoring study as calibrated in the County's hydraulic model. Under the simulated dry weather condition with design peak flow contributions from pending and approved sewer connection requests, gravity pipes with projected flows less than or equal to 85% capacity shall be considered to have acceptable capacity. Engineering judgment shall be utilized and documented when evaluating acceptable capacity where the model predicts flow rates exceeding 85% of the pipe capacity due to reverse-grade or flat-grade pipe segments.

# 3.3.2. Wet Weather Flow Condition and Level of Service

The wet weather flow condition shall be the maximum month average daily flow calculated from the most current flow monitoring study as calibrated in the County's hydraulic model. Under the simulated wet weather condition with design peak flow contributions from pending and approved sewer connection requests, gravity pipes with a projected flows less than or equal to full pipe capacity shall be considered to have acceptable capacity.

## 3.4. Capacity Evaluation of Transmission System

The firm capacity of each lift station shall be defined as its maximum flow capacity with the largest pump out of service. Lift Stations whose firm capacity exceeds the maximum flow rates simulated by the model to be conveyed to the lift station under the dry and wet weather flow conditions described in Section 3.3.1 and Section 3.3.2 above shall be considered to have acceptable capacity.

Commented [A4]: 85% is higher than industry standards for design dry weather flow. EPA/EPD will not specify the acceptable limit but recommends that the County considered industry standards in its solutions.

Commented [A5]: ...or provide justification for using a non-industry standard.

Commented [A6]: Language needs to be changed, at full pipe capacity you do not have any additional capacity. You are allowed to go up to full pipe, but that is the limit.

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#### 3.5. Capacity Evaluation of Wastewater Treatment System

Wastewater treatment systems with sufficient capacity to process the maximum flow rates simulated by the model to be conveyed to the wastewater treatment system under the dry and wet weather flow conditions described in Section 3.3.1 and Section 3.3.2 above without resulting in bypasses or diversions prohibited by the wastewater treatment system's current National Pollution Discharge Elimination System (NPDES) permit shall be considered to have acceptable capacity.

#### 3.6. Capacity Evaluation of Intergovernmental Connections

Connections to other governmental jurisdictions shall be considered to have acceptable capacity so long as the maximum flow rates simulated by the model under the dry and wet weather flow conditions described in Section 3.3.1 and Section 3.3.2 above are less than the maximum flow rate provided in the County's associated Intergovernmental Agreements.

#### 3.7. Conditional Approval of Capacity

Conditional approval of capacity may be made based upon the options provided below:

#### 3.7.1. Completion of Capacity Improvement Projects

Conditional approval of capacity may be made when capacity improvement projects are planned which will convey the design peak flow rates from all pending, conditionally approved, and approved capacity requests so long as such projects meet the following requirements:

- Eliminates potential reoccurrences of capacity-related SSOs described in Section 3.2 above; and
- Conveys the peak flow rate simulated by the model under the dry and wet weather conditions
  described in Section 3.3.1 and Section 3.3.2 above at less than or equal to the limits required for
  consideration of acceptable capacity as defined in this Program.

Developers may fund and/or construct capacity improvement projects when approved by the County. Capacity improvement projects meeting the requirements described above must be completed prior to the addition of the proposed flow contribution.

### 3.7.2. Other Proposed Alternative Capacity Solutions.

Applicants may submit alternative proposals, such as the design and construction of on-site storage systems, to remedy capacity limitations in order to gain conditional capacity approval. These alternative solutions must be designed and signed by a professional engineer registered in the State of Georgia and shall be subject to review and approval by the County with an avenue for appeal provided. Such solutions, if approved by the County, must be completed prior to the addition of the proposed flow contribution.

Commented [A7]: See EPA/EPD definitions for adequate Capacity for the WCTS, Conveyance and treatment below...

### Commented [A8]:

**Commented [A9R8]:** Should be stated clearly to indicate project completion prior to connection to the WCTS.

**enoitinila** 

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Adequate Transmission Capacity — Adequate transmission capacity, shall be demonstrated by the Defendant's certification that each pump station through which all flow from the newly, authorized sewer service connections) or increased flows from existing server service connections passes to the passing through the pump station plus the addition to existing peak flow predicted to occur from the meals authorized sewer service connections in the addition to existing search flow predicted to occur from the meals flow predicted to occur from the connections and the addition to existing search service connections.

3.

Adequate Collection Capacity Sewer Line through which all flow from the newly authorized sewer service connection(s) or increased flows from existing sewer service connections passes to the Wastewater Ereating the existing one (1) hour peak flow passing.

### MARDORY NOITAULAVE YTIDARAC SEWER CAPACITY EVALUATION PROGRAM

through the Gravity Sewer Line plus the addition to existing peak flow predicted to occur from the new Ly authorized sewer service connections; or increased flows from existing sewer service connections, and the addition to that existing peak flow predicted to occur from all other authorized sewer service connections which have not begun to discharge into the Defendant's Wastewater Collection and Transmission Systems, proxided as follows:

[Transmission Systems, proxided as follows]

is available to carry existing and new flows in Defendant's Wastewater Collection and Transmission.

(b) In developing estimates and projections for certifying adequate capacity, the

Defendant shall use records, flow meter records, good engineering judgment, and the Hydraulic Model.

Zhacro System Evaluation. Peak Flow Evaluations and Sewer System Evaluation Survey results when available. Flows to be considered shall include the contributions to the Defendant's Wastewater.

Collection and Transmission Systems received from militim its jurisdictional boundaries as well as any contributions received from outside its jurisdictional boundaries.

(c) For the purpose of the Interm Capacity Evaluation and SOP documents, the term

"one hour peak flow," shall mean the greatest flow in a sewer averaged over a sixty (60) minute period at a specific location expected to occur as a result of a representative 2 year-24 hour storm event. The term "Surcharge Condition" shall mean the condition that exists when the supply of wastewater resulting from the one (1) hour peak flow is greater than the capacity of the pipes to carry it and the surface of the pipe of within three (3) leet of the run of the manhole, and the sewer is under pressure or head, rather than a number of the run of the manhole, and the sewer is under pressure or head, rather than operate in that condition in which case the countried level of surcharge will be used. However any use operate in that condition in which case the identified that pipe of surcharge will be used. However any use

Page 7 of 7

# INTERIM SANITARY SEWER CAPACITY EVALUATION PROGRAM

experienced a wet weather SSO since the effective date of the CD (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions), unless the County can certify that the cause of the SSO has been corrected through improvements to the WCTS.

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			*	
	<b>S</b>			



# DEPARTMENT OF WATERSHED MANAGEMENT (DWM) INTERIM STANDARD OPERATING **PROCEDURE**

Commented [A1]: All the below comments should be reflected in the "Capacity flowchart"

SOP TITLE:

SOP NUMBER:

SOP OWNER (Division/Office):

SOP APPROVAL:

SOP LAST REVIEWED / UPDATED DATE:

SOP REVISION NUMBER:

Interim Sanitary Sewer Capacity Certification SOP

CD-SOP-001

Infrastructure Acquisitions Program

DCOO/Infrastructure

12/15/2017

#### I. PURPOSE

The purpose of this Interim Standard Operating Procedure (SOP) is to standardize the process for determining whether or not sanitary sewer capacity can be acceptably assured to convey additional sewage flow. Sufficient capacity is defined by County policies regarding acceptable system conditions and levels of service which are Commented [A2]: This SOP should include specific referenced in the Procedures section of this document. This SOP is to be used until the County either adopts a capacity assurance program or a fully dynamic hydraulic model is developed.

#### II. SCOPE

Effective December 20, 2017, Sanitary Sewer Capacity Certification is required for new connections and increases in flows by any entity, public or private into the DeKalb County wastewater collection and transmission system (WCTS).

This SOP will be utilized by internal staff in Planning and Development, Hydraulic Modeling, Flow and Rainfall Monitoring, and County representative as needed to certify sewer capacity to the applicant.

- DeKalb County Interim Sanitary Sewer Capacity Evaluation Program
- Sewer Capacity Evaluation Request Form
- Capacity Letters Tracking Master Sheet
- Capacity Analysis Form
- Capacity Allotment Master Sheet
- Template Standard Capacity Letter

definitions and parameters for adequate collection, treatment and transmission capacity of wastewater in the service area. Acceptable definitions are provided in the Comments on the Interim Capacity Evaluation Program.

#### IV. RESPONSIBILITIES

- Planning and Development (P&D) within DWM: Communicate with Applicant, ensure required documentation is complete and accurate prior to initiating process to set up a project, initiate process.
- Modeler: Model capacity, identify locations for flow monitoring, flow monitoring data analysis, and communicate.
- Administrative Support: Maintain electronic and paper records, update as necessary and communicate. Commented [A3]: For audit purposes we would like to be
- Flow Monitoring Personnel: Install monitors at locations as requested; calibrate and maintain for the able to examine original paper copies of field recordings as designated period; notify modeler when required period of data are available on Flowlink Server; and appropriate. communicate and document.
- Geographic Information System (GIS) Personnel: Provide survey confirmation support when requested and provide updated GIS files routinely for update of Hydraulic Model.
- Capacity Certification Engineer: County staff or consulting engineers who are licensed professional engineers in the State of Georgia who evaluate capacity requests and provide certification on behalf of the County.
- Consent Decree Administrator: Provide review of capacity improvement solution to determine whether the solution complies with the Consent Decree, County's policies, best practices, and goals.
- Responsible Party of the County: Provide approval of capacity certifications made by the Capacity Certification Engineer.
- Deputy Chief Operating Officer for Infrastructure: Provide review and approval of Applicant's appeal of County's denial of Sewer Action Plan. The appeal process will adhere to the terms of the Consent Decree.

#### V. PROCEDURES

#### **EVALUATION AND APPROVAL PROCESS**

An overview of the capacity request evaluation and approval process is provided with the attached flow chart. The numbers and letters associated with the evaluation steps presented below correspond with those indicated on the flow chart.

While many of the evaluation steps below describe specific parameters for the County evaluating capacity, engineering judgment shall be used in all evaluations. As such, it is considered acceptable, in unique situations, to adjust a parameter based upon documented reasoning so long as the County's capacity certification is approved by a registered Georgia Professional Engineer.

### Activities 1-4: Applicant Submittal of and County Verification of Sewer Capacity Request (SCR) Form

The Sewer Capacity Evaluation Request (SCR) form shall be completed and submitted by all entities, public or private, proposing to discharge new or modified flows into the DeKalb County Sewer System. A copy of the County's SCR completion instructions and supporting documentation will be available to the applicant.

P&D shall review the SCR form to determine completeness and to verify compliance with the Capacity Evaluation Program and Procedures. Verification shall include the following:

Confirmation that the calculated design flow rates provided conform to the standard design flow rates for various contributor classifications as provided by the County (See Appendix B, Table 1 of the County's SCR form). The County will consider alternative flow contribution rates if the applicant provides supporting documentation. For contributors not listed in Appendix-B, Table 1 of County's SCR, P&D shall confirm the suitability of the design flow rates provided. The County may or may not accept the alternate flow rates

#### Commented [A4]:

Commented [A5R4]: The language here needs to be clarified to indicate that the consulting engineer is hired by the county and has full access to all the necessary information needed to provide certification.

Commented [A6]: Included here or elsewhere is the need to state that the process used and full documentation of how the engineer arrived at capacity certification should be available for EPA/EPD and/or other external auditors.

Commented [A7]: Approval cannot be given without a documented technical basis and must be consistent with the terms of the Consent Decree. No approval should be given by the Deputy Chief Officer without certification of capacity by a Georgia PE.

provided. P&D shall further confirm that the peak flow rates determined by the applicant meet the requirements of the SCR.

 Confirmation that the SCR has been signed and sealed by a professional engineer registered in the State of Georgia for all SCRs except those applications with design average daily flow rates exclusive of any offsets or allowances which exceed 500 gallons per day.

# Decision A: SCR Completed Per Program and Procedural Requirements

If the SCR is complete and verified, it shall be so noted by P&D and shall proceed to Activities 5A and 5B below. Otherwise, the completeness and verification issues shall be noted and the form shall be returned to the applicant for correction and resubmission.

Verified SCRs shall be recorded into the Sewer System Capacity Allotment Tracking Form and their status shall be designated as PENDING.

Deductions in design peak flow rates resulting from developments with properties that have discontinued or reduced discharges to the WCTS shall also be included to the Sewer System Capacity Allotment Tracking Form.

### Activities 5A and 5B: Evaluation of Capacity Against Program Requirements

# Activity 5A: Review Historical Capacity Related SSOs Downstream of SCR Connection

Review the recorded SSO occurrences over the time period defined in the County's Sanitary Sewer Capacity Evaluation Program and determine the number and location of downstream capacity related SSOs. Do not include SSOs attributed exclusively to maintenance issues such as FOG, debris, roots, etc. in the review. Do not include SSOs where subsequent system or operational improvements have been completed to eliminate a repeat capacity related SSO occurrence. Do not include SSOs unless the SSOs have the potential to occur again under normal annual dry and wet weather flow conditions.

# Activity 5B: Perform Hydraulic Analysis of Applicant's Flow Under Program Conditions

Hydraulic analysis of the impact of the applicant's design peak flow contribution shall be completed using the County's hydraulic model. The hydraulic analysis shall include each of the following flow conditions:

- Sewer system flow conditions as defined by County's Sanitary Sewer Capacity Evaluation Program, and
- Peak flow contributions from all PENDING, CONDITIONALLY APPROVED, and APPROVED SCR's in the County's Sewer System Capacity Allotment tracking form since the last system model flow calibration, and
- Peak flow contributions from the applicant's SCR.

Capacity Certification shall comply with the County's Sanitary Sewer Capacity Evaluation Program that identifies the system flow conditions and levels of service to be assessed for determination of sewer capacity.

# Decision B: Determine Whether Applicant's SCR Meets Capacity Program Requirements

If the design peak flow provided in the SCR meets the County's Sanitary Sewer Capacity Evaluation Program requirements as referenced in Activities 5A and 5B above, proceed to Activity 6: County Sends Letter Approving Sewer Capacity Request.

Applications that do not meet the capacity program requirements defined under Activities 5A and 5B shall proceed to Activities 5C and 5D below.

### Activities 5C and 5D: Verification of Asset and Flow Information

Activity 5C: Confirm Existing Asset Information

Active 31477685v17 015349.000034

Commented [A8]: Does this refer to "average daily flow rates" or to "offsets or allowances"?

Commented [A9]: Given the County's track record of under reporting and incorrect recording of SSOs, the EPA/EPD are uncomfortable with this entire provision/Activity as written. This does not comply with the terms of the CD, because past capacity related SSOs are clear evidence that there is not adequate capacity.

Commented [A10]: If a project has been completed and you are still having SSOs, then likely something needs additional examination/scrutiny. To not include this type SSO is to undermine the integrity of any analysis carried out.

Commented [A11]: How would the reviewer determine that this particular SSO will not occur in the future? This sort of prediction is what a dynamic hydraulic model provides... something the county does not have currently.

Sewer system asset information including pipe diameters, pipe materials, pipe slopes, and manhole depths impacts the results of the hydraulic analysis described in Activity 5B. As a result, should the hydraulic analysis determine that the SCR does not meet the capacity compliance program limits, the following GIS items shall require further field verification by the County:

- Instances where larger diameter pipes connect to downstream smaller diameter pipes; or
- Instances of reverse grade pipe slopes; or
- Shallow slope (less than minimum standard grade) pipes that are inconsistent with slopes of adjacent
- Shallow manholes that are inconsistent with manhole depths of adjacent manholes.

#### Activity 5D: Validate System Flows with Temporary Flow Data Where Necessary

Temporary flow meters may be installed by the County downstream of the applicant's proposed flow connection point(s) to help validate model results or when the County believes additional flow monitoring is needed to better determine existing conditions from the proposed flow connection to the collection system's

The flow meters should be installed along the conveyance route at critical hydraulic locations downstream of the proposed flow connection and where the flow monitoring personnel determine hydraulics are suitable for accurate measurement. Engineering judgment shall be used to determine whether sufficient flow data has been collected to assess whether acceptable capacity is available to meet the capacity program requirements. Flow monitoring data from a prior capacity request evaluation or a prior flow study may also be used to assess capacity should engineering judgment determine that the location and time period of the flow monitoring is appropriate and sufficient to certify capacity. The flow data collected and basis for the determination of acceptable capacity shall be fully documented and recorded with the capacity certification.

#### Decision C: Determine Whether Asset Information Changes to the Hydraulic Model are Required

Asset information changes resulting from field verifications identified under Activity 5C above shall be incorporated into the model and the hydraulic analysis shall be re-performed in accordance with Activities 5A and 5B above.

If the updated hydraulic analysis results in compliance with the County's Sanitary Sewer Capacity Evaluation Commented [A13]: Is this sentence intended to read ...if Program, then proceed to Activity 6: County Sends Letter Approving Sewer Capacity Request; otherwise proceed to Decision E: Determine Applicant's Options to Achieve Capacity Compliance.

#### Decision D: Determine Whether Temporary Flow Data Supports Assessment of Acceptable Capacity

If, based on engineering judgment, temporary flow data supports the certification of acceptable capacity, then proceed to Activity 6: County Sends Letter Approving Sewer Capacity Request; otherwise proceed to Decision E: Determine Applicant's Options to Achieve Capacity Compliance.

### Activity 6: County Sends Letter Approving Sewer Capacity Request

Upon certification by the Capacity Certification Engineer and approval by the Responsible Party of the County, the County shall send a letter to the applicant approving sewer capacity. Additionally, the application status shall be changed from PENDING to APPROVED in the Sewer System Capacity Allotment Tracking form.

#### Decision E: Determine Applicant's Options to Achieve Capacity Compliance

#### Subtask E1: Determine Capacity Improvement Options Available to the Applicant

The County shall determine whether capacity improvements that will meet capacity program requirements are available for completion by the applicant.

Commented [A12]: The capacity certification must be conducted by a Georgia PE. Temporary flow monitoring is not a mechanism to override PE certification.

the updated model no longer indicates capacity limitations...?

# Subtask E2: Determine Suitability of Other Alternative Capacity Solutions

The applicant may submit alternative solutions, such as the design and construction of on-site storage system, to remedy capacity limitations. Alternative solutions proposed by the applicant must be designed and signed by a professional engineer registered in the State of Georgia. The County will determine the suitability of any Commented [A14]: The County should reserve the final alternate capacity solutions proposed by an applicant.

# Subtask E3: Determine Capacity Improvement Options Scheduled for Completion by the County

The County shall determine whether capacity improvements that will meet capacity program requirements are scheduled for completion by the County.

### Activity 7: Send Notice to Applicant with Available Options

If any of the capacity compliance options described in Subtasks E1-E3 above are determined to be available then the County shall send a notice to the applicant identifying the available options. The notice shall indicate a deadline for which the applicant must return a Sewer Action Plan (SAP) in order to achieve capacity certification.

If none of the capacity options described in Subtasks E1-E3 above are determined to be available then proceed to Activity 10: County Sends Letter Denying Application. Additionally, the application status shall be changed from PENDING to DENIED in the Sewer System Capacity Allotment tracking form.

#### Decision F and Activity 8: Applicant Agrees to Participate in Capacity Compliance Options and Submits Sewer Action Plan (SAP)

The applicant shall determine whether or not to participate in the capacity compliance options provided. If so, the applicant shall submit a SAP identifying the selected capacity compliance option.

# Decision G: County Determines Whether Sewer Action Plan (SAP) is Acceptable

If the County has not received a SAP from the applicant by the deadline presented in the County's notice identifying the available capacity compliance options, then proceed to Activity 10: Send Letter Denying Application. Additionally, change the status of the application from PENDING to DENIED in the Sewer System Capacity Allotment tracking form.

The County shall review the applicant's SAP to determine acceptability. The design of alternative solutions proposed by the applicant per Subtask E2 above shall be reviewed by the Capacity Certification Engineer to determine whether the design complies with the County's engineering standards. Upon acceptance by the Capacity Certification Engineer, the Consent Decree Administrator shall determine whether the design complies with the Consent Decree, County's policies, best practices, and goals. If the SAP is determined to be unacceptable, the County shall return a letter to the applicant documenting the changes required to allow for conditional approval of the capacity request. If the SAP is determined to be acceptable, then proceed to Activity 9: County Issues Conditional Approval of Capacity Request.

The applicant may appeal the County's denial of the applicant's SAP. In such cases, the County's Chief Operating Officer for Infrastructure shall determine whether the facts presented in the appeal meets the requirements of the Consent Decree and merits approval of the SAP.

# Activity 9: County Issues Conditional Approval of Capacity Request

The County shall submit a letter to the applicant granting conditional certification of the capacity request. The letter shall identify that the applicant must present proof of completion of the capacity compliance options Commented [A17]: The county engineer needs to buy off required by the applicant as identified in their approved SAP in order to initiate flow discharge to the County's on this proof of completion in order to certify capacity.

say in the approval of any alternate capacity solutions recommended by an applicant.

Commented [A15]: The County's engineer must certify that he system has adequate capacity under all expected flow conditions, and that proper implementation and operation can be verified.

Commented [A16]: The CD requires PE certification for all new/increased flows. Regardless of the County's Chief Operating Officer for Infrastructure determination in an appeal, no connection may occur without certification by the PE that there is adequate capacity.

sewer system. Additionally, the application shall be changed from PENDING to CONDITIONAL APPROVAL in the Sewer System Capacity Allotment tracking form.

### Activity 10: County Sends Letter Denying Application

The County shall submit a letter to the applicant denying the application for capacity. The letter shall identify the reason for denial of the request. Additionally, the application shall be changed from PENDING to DENIED in the Sewer System Capacity Allotment tracking form.

#### VI. REFERENCES

- Clean Water Act Consent Decree 1:10cv 4039-WSD
- System-Wide Hydraulic Model, Department of Watershed Management (DWM) Capacity, Management, Operations and Maintenance (CMOM) Program, Current version
- System-Wide Flow and Rainfall Monitoring Program, DWM CMOM Program, Current Version
- Infrastructure Acquisitions Program, DWM CMOM Program, Current Version
- "Potable Water Main, Gravity Sanitary Sewer, and Sanitary Sewer and Force Main Design Standards", Current version
- DeKalb County Code of Ordinances, Chapter 24 "Water, Sewers and Sewage Disposal", Current Version
- Capacity Allotment Program Coordination Procedure

#### VII. DEFINITIONS

- CMOM Capacity, Management, Operations, and Maintenance
- DWM DeKalb County Department of Watershed Management
- FOG Fats, Oils, and Greases
- GIS DWM Geographic Information System
- I/I Infiltration and Inflow
- P&D DWM Planning and Development
- SAP Sewer Action Plan
- SCR Sewer Capacity Evaluation Request
- SOP Standard Operating Procedure
- SSO Sanitary Sewer Overflow
- WCTS Wastewater Collection and Transmission System
- General Comments:
- Activity 5A &5B needs to be revised to make clear that approval in Decision B
  will only occur when the reviews in Activity 5A and Activity 5B each support a
  determination that there is adequate collection and transmission capacity in
  the receiving portions of the WCTS. If either Activity 5A or Activity 5B reveals
  that there may be a lack of capacity, then proceed to Activity 5C.
- Activity 6 needs to be revised to make it clear that all approvals (and
  conditional approvals) must have certification by a PE as well as thorough
  documentation of the basis for the approval. Certification should include a
  certification statement from the PE as to what they are certifying (adequate)

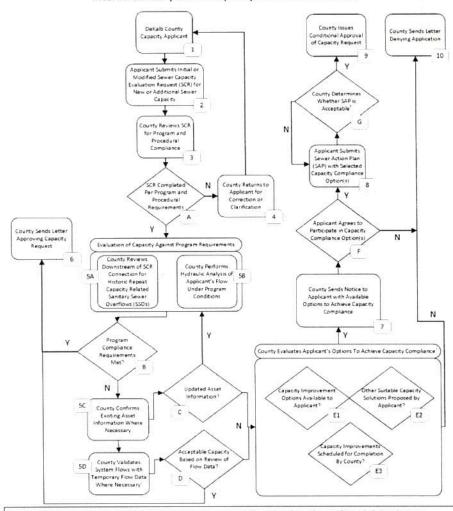
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### actual capacity) and that there is sufficient documentation to support the decision, such as:

certify that the receiving portions of the WCTS have adequate collection and transmission capacity and the Formatted: Normal, No bullets or numbering applicable WWTF has adequate treatment capacity for the proposed new sewer service connection or increase in flow from an existing service connection. Lalso certify that there is adequate documentation to support this conclusion and that a reasonable third party professional engineer would reach the same

### VIII. Flowchart Depicting Sewer Capacity Protocol

# Interim Sanitary Sewer Capacity Protocol Flow Chart<sup>1</sup>



- 1 Reference the Sewer System Capacity Certification Standard Operating Procedures and the Sanitary Sewer Capacity Evaluation Program for further information
  2 Temporary flow meters may be installed regardless of whether Capacity Evaluation Program requirements have been met when the County believes additional flow
  monitoring is needed to better determine eusting conditions.
  3 County shall perform hydraulic analysis of capacity improvement options under program conditions to determine whether options are sufficient for applicant to achieve
- capacity compliance.

  4 The applicant may appeal the County's decision to deny the applicant's SAP. Appeals shall be adjudicated by the County's Chief Operating Officer for infrastructure. Legend - N = No, Y = Yes, Diamond = Decision; Rectangle = Activity

12-15-2017

ė.			
*			

# Elliott, Richard

From:

Rhinehart, William E. (Ted) < werhinehart@dekalbcountyga.gov>

Sent:

Wednesday, February 14, 2018 2:33 PM

To:

Elliott, Richard; Horsey, Maurice

Cc:

Veira, E. Fitzgerald (Troutman Sanders); maria.houser@troutmansanders.com; Bush,

William; Welch, Matthew C.

Subject:

Re: EPA/EPD Collection System Inspection

10-4. We'll be ready for Weds

We'll get suggested time for Tues with modelers

### Get Outlook for iOS

From: Elliott, Richard < elliott.richard@epa.gov > Sent: Wednesday, February 14, 2018 1:39 PM Subject: RE: EPA/EPD Collection System Inspection

To: Rhinehart, William E. (Ted) < werhinehart@dekalbcountyga.gov >, Horsey, Maurice < horsey.maurice@epa.gov >

Cc: Veira, E. Fitzgerald (Troutman Sanders) < <a href="mailto:fitzgerald.veira@troutmansanders.com">fitzgerald.veira@troutmansanders.com</a>,

maria.houser@troutmansanders.com <maria.houser@troutmansanders.com >, Bush, William <bush.william@epa.gov >,

Welch, Matthew C. < macwelch@dekalbcountyga.gov>

#### Ted,

Please confirm the time with CEO Thurmond for next week Wednesday. I am not sure how integrating the CEO into this inspection will work. We intend to be somewhere in the field conducting the inspection at that time. I will leave how the CEO fits into the day's activities up to you.

I would like to touch bases with your modelling team on Tuesday 2/20/2018. Can you please get back to me with a time and other logistics for Tuesday. On Wednesday, we would like to meet at the Snapfinger Creek plant at 9:00 AM and hopefully begin the inspection by about 9:30 AM. Factoring traffic and drive time we should be done by 4 PM or so.

#### Thanks

Richard Elliott, P.E., PMP

Environmental Engineer

From: Rhinehart, William E. (Ted) [mailto:werhinehart@dekalbcountyga.gov]

Sent: Wednesday, February 14, 2018 11:39 AM To: Elliott, Richard < Elliott.Richard@epa.gov>

Cc: Veira, E. Fitzgerald (Troutman Sanders) < fitzgerald.veira@troutmansanders.com >;

maria.houser@troutmansanders.com; Bush, William < Bush.William@epa.gov>; Welch, Matthew C.

<macwelch@dekalbcountyga.gov>

Subject: RE: EPA/EPD Collection System Inspection

Richard, good morning,

CEO Thurmond is available next Weds 21st in the afternoon, starting at 1 pm; should we confirm that time?

We have asked our modelling team to be prepared ahead of that to generate the outputs you described below for predicted sites you'd want to go see in the field

And you're right, we're planning to have available the managers and supervisors who are able to access the lift stations, open manholes, etc for the sites visited

10-4? Thanks, Ted Rhinehart

From: Elliott, Richard [mailto:Elliott.Richard@epa.gov]

Sent: Tuesday, February 13, 2018 12:16 PM

To: Welch, Matthew C. < macwelch@dekalbcountyga.gov >; Rhinehart, William E. (Ted)

<werhinehart@dekalbcountyga.gov>; Shahbazaz, Marzieh < Marzieh.Shahbazaz@dnr.ga.gov>; Hays, Lewis

<<u>Lewis.Hays@dnr.ga.gov</u>>; Horsey, Maurice <<u>Horsey.Maurice@epa.gov</u>>

Cc: Veira, E. Fitzgerald (Troutman Sanders)

<fitzgerald.veira@troutmansanders.com>;maria.houser@troutmansanders.com; Bush, William

<Bush.William@epa.gov>; Stephenson, Natalie <stephenson.natalie@epa.gov>; Ernstes, Viviane

<vernstes@dekalbcountyga.gov>; Zapata, Cesar < Zapata.Cesar@epa.gov>

Subject: RE: EPA/EPD Collection System Inspection

Matt,

In response to the salient points in your email below, we are happy to accommodate the County's CEO on our inspection. However, I would like to clarify a few things.

First, we do not intend to focus our inspection of the Snapfinger Creek WWTP. The WWTP is being used as a convenient meeting point for all the parties involved in this inspection.

Second, the questions related to the hydraulic modelling aspects of the CD are mainly centered around possible hot spots/Overflow locations that the model may indicate. Our intention is to visit those locations on the day of the inspection and we would therefore prefer to have that information prior to the day of the field inspection. I will be following up with you and/or Mr. Rhinehart on this particular issue shortly.

Third, my understanding from our attorney is that the county plans to make several staff members available for this inspection. I would like to emphasize that this inspection will require staff that is familiar with the day to day operation of the collection system as well as managers/upper level staff. Since we intend to look at Pump Stations and into Manholes, we would appreciate the presence of County staff that have the appropriate equipment and training to facilitate access to those assets.

Finally, the proposed date in your email (2/23/18) does not work for our team. I am suggesting a change to Wednesday February 21, 2018. I hope CEO Michael Thurmond is available that day. Please feel free to contact me if you have questions.

Regards

Richard Elliott, P.E., PMP

Environmental Engineer Water Protection Division U.S. Environmental Protection Agency - Region 4 61 Forsyth Street. S.W. Atlanta, GA 30303 404-562-8691 404-562-9729 (Fax)

From: Welch, Matthew C. [mailto:macwelch@dekalbcountyga.gov]

Sent: Friday, February 09, 2018 5:12 PM

To: Rhinehart, William E. (Ted) < werhinehart@dekalbcountyga.gov >; Elliott, Richard < Elliott.Richard@epa.gov >; Shahbazaz, Marzieh < Marzieh.Shahbazaz@dnr.ga.gov >; Hays, Lewis < Lewis.Hays@dnr.ga.gov >; Horsey, Maurice

<Horsey.Maurice@epa.gov>

Cc: Veira, E. Fitzgerald (Troutman Sanders)

<fitzgerald.veira@troutmansanders.com>;maria.houser@troutmansanders.com; Bush, William
<Bush.William@epa.gov>; Stephenson, Natalie <stephenson.natalie@epa.gov>; Ernstes, Viviane

<vernstes@dekalbcountyga.gov>

Subject: RE: EPA/EPD Collection System Inspection

Richard.

I write as a follow up to discussions between you and Ted Rhinehart regarding an inspection of the DeKalb County collection system. I understand that EPA and EPD are interested in inspecting the Snapfinger Creek WWTP and the pump stations that convey flow to Gwinnett county from DeKalb. I also understand that , EPA would like to meet with members of the County's team who handle the hydraulic modelling to address questions specific to the modelling aspects of the CD. I have placed calls to both you and Bill Bush in the last two days in an attempt to address your request, but have been unable to reach either of you.

Your email regarding the inspection gave just one date for the proposed inspections, February 16, 2018. Unfortunately, I have just learned that the requested date is problematic for the County on a couple of fronts.

First, the requested date is the Friday before a Monday holiday and key players are scheduled to be away that day. Additionally, DeKalb County CEO Michael Thurmond intends to be present during the inspection of Snapfinger Creek WWTP and is himself unavailable on February 16, 2018.

Second, it is our understanding from CH2, who developed the County's hydraulic model, that their two primary modelers will be unavailable on February 16, 2018 as they will both be away for Chinese New Year. However, depending on the nature of the questions EPA has regarding the model itself, it might be possible to conduct that portion of the review on February 16. Please give me or Mr. Rhinehart a call to discuss the expected parameters of the modeling inquiry so that we can determine if we will be in a position to address those matters on February 16. We would also respectfully request that the visit to Snapfinger and the pump stations in question be scheduled for Friday, February 23, 2018 so that our key players and our CEO can participate.

Matthew C. Welch Supervising County Attorney DeKalb County Law Department 1300 Commerce Drive, 5th Floor Decatur, GA 30030 404-371-3011 404-371-2297 (direct) 404-371-3024 (facsimile) macwelch@dekalbcountyga.gov

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From: Rhinehart, William E. (Ted)

Sent: Friday, February 02, 2018 3:47 PM

To: Elliott, Richard; Shahbazaz, Marzieh; Hays, Lewis; Horsey, Maurice

Cc: Veira, E. Fitzgerald (Troutman Sanders); maria.houser@troutmansanders.com; Bush, William; Stephenson, Natalie;

Welch, Matthew C.

Subject: RE: EPA/EPD Collection System Inspection

Richard, good afternoon.

We'll be prepared for the site visits on the 16<sup>th</sup>. Please let me know when you're ready to talk specifics re: times and locations, etc.

Best regards, Ted Rhinehart, Deputy COO/DeKalb County

From: Elliott, Richard [mailto:Elliott.Richard@epa.gov]

Sent: Friday, February 02, 2018 8:45 AM

To: Rhinehart, William E. (Ted) < werhinehart@dekalbcountyga.gov >; Shahbazaz, Marzieh

<Marzieh.Shahbazaz@dnr.ga.gov>; Hays, Lewis <Lewis.Hays@dnr.ga.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

Cc: Veira, E. Fitzgerald (Troutman Sanders)

<fitzgerald.veira@troutmansanders.com>;maria.houser@troutmansanders.com; Bush, William

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Subject: EPA/EPD Collection System Inspection

Ted,

A team from EPA and EPD would like to conduct an Inspection of DeKalb County's collection system on Friday February 16, 2018. We are interested in taking a closer look at any existing SSO hot spots and on any other general programmatic CD compliance related issues. We anticipate a start time of about 9:00 AM. Please feel free to touch base with us if you have any questions. Additionally, please forward this to the appropriate personnel on your team.

We can work out any remaining logistic in the coming week.

Regards

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